



800 Boylston Street Boston, Massachusetts 02199

Jeffrey N. Stevens, Esq.  
Assistant General Counsel

Phone No. (617) 424-2141  
Fax No. (617) 424-2733  
E-mail: jeffrey\_stevens@nstaronline.com

March 2, 2004

**VIA HAND DELIVERY**

U.S. Environmental Protection Agency  
Martha Bosworth, Enforcement Coordinator  
Office of Site Remediation & Restoration (HBS)  
1 Congress Street, Suite 1100  
Boston, MA 02114

ATTN: Wells G&H Case Team

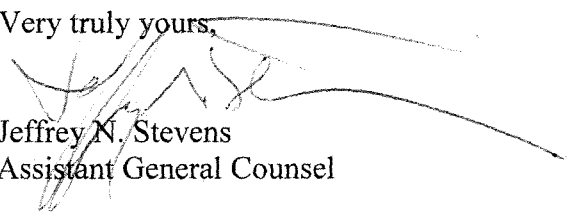
Re: Request for Information Pursuant to Section 104 of CERCLA in relation  
to the former Whitney Barrel Company at the Wells G & H Superfund  
Site in Woburn, MA.

Dear Ms. Bosworth:

Boston Edison Company hereby responds to the above-referenced information request dated December 15, 2003. Based on telephone conversations with EPA Attorney Mary Jane O'Donnell on January 7, 2004 and February 9, 2004 the time period for submittal of this response was extended to March 2, 2004.

Should EPA have any questions concerning this response, please contact me at (617) 424-2141.

Very truly yours,



Jeffrey N. Stevens  
Assistant General Counsel

Enclosures

cc: Mary Jane O'Donnell, Esquire EPA w/out enclosures

0004-0001

**RESPONSE OF BOSTON EDISON COMPANY  
TO EPA REQUEST FOR INFORMATION  
PURSUANT TO § 104 OF CERCLA  
IN RELATION TO THE FORMER WHITNEY BARREL COMPANY  
AT THE WELLS G & H SUPERFUND SITE IN WOBURN, MA**

This response is submitted by Boston Edison Company ("Boston Edison" or the "Company") to the "Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, MA," which was issued by letter dated December 15, 2003.

It is stated at the outset of the December 15, 2003 letter that EPA is investigating the source, extent and nature of the release or threatened release of any hazardous substance, pollutant or contaminant, or hazardous waste at the Whitney Barrel Company, 256 Salem Street, Woburn, MA situated within the Wells G & H Superfund Site in Woburn, MA (the "Site"). EPA also states that its investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to the Site and/or generated, treated, stored, or disposed of at the Site. Finally, EPA's December 15, 2003 letter states that EPA has information associating Boston Edison with the Whitney Barrel Company property at the Site. The period being investigated is from 1950 through 1985.

Boston Edison has been unable to locate any documents indicating that the Company did business with Whitney Barrel Company. Enclosure D to EPA's December 15, 2003 letter states that the Whitney Barrel Company operated a barrel and drum reclamation and resale business and that Whitney Barrel Company provided EPA with a customer list. In a telephone conversation with EPA's counsel on January 7, 2004 the Company was informed that the Whitney Barrel Company customer list does not provide any information as to the nature of the business relationship, including whether a listed customer purchased or sold barrels to Whitney Barrel Company, nor does the customer list provide any information as to the time period that a listed entity was a customer or the location of that customer.

Boston Edison is an investor-owned regulated public utility. It supplies electricity at retail to an area of 590 square miles, including the city of Boston and 39 surrounding cities and towns. During the period being investigated Boston Edison had 5 generating stations, 9 service centers, a central office location and approximately 30 electrical substation properties located throughout Eastern Massachusetts.

As stated above, the Company has been unable to locate any documents indicating that Boston Edison did business with Whitney Barrel Company and other than reference to a customer list, EPA has not provided the Company with any documents that would indicate that the Boston Edison ever did business with Whitney Barrel Company. As part of its due diligence in responding to this Information Request, the Company did consult with individuals working in the Purchasing or Warehousing Departments of the Company to inquire as to whether they could remember doing business with Whitney

Barrel Company. No one in Purchasing remembered this vendor or issuing orders to Whitney Barrel Company. One individual in Warehousing and Distribution indicated that the supplier name sounded familiar. His recollection was that Boston Edison may have purchased some "open top drums" or "storage drums" from Whitney Barrel Company. In addition, based on the 1990 deposition testimony of a number of Boston Edison employees in the Charles George Superfund Site litigation, during the period being investigated, the business practice of Boston Edison regarding the handling of drums was that all drums were returned from the various Boston Edison facilities to the Company's Stores & Services Department (located at Mass Ave or Watertown depending on the time period involved) for return of the drums to the original vendor for a credit or refund.

Accordingly, Boston Edison objects to this information request on the basis of irrelevancy and on the basis of EPA's lack of authority, insofar as it seeks information unrelated to conditions at the Site or to materials that were generated, treated, stored or disposed of at the Site. Furthermore, insofar as the information request seeks a vast quantity of detailed information for a 35 year time period going back almost 50 years, most of which is completely unobtainable, or partially obtainable only after extensive research, and none of which has any evident connection to the Site, Boston Edison Company further objects to this information request on grounds of over breadth and burdensomeness.

Notwithstanding the foregoing objections and in the interest of making as complete a response as possible and without waiver of the Company's objections, Boston Edison provides the following responses. It should be noted that, due to the lack of specific documentation or information relative to the Whitney Barrel Company or the Site, the number of properties owned by Boston Edison throughout Eastern Massachusetts and the fact that the information request seeks a vast quantity of detailed information for a 35 year time period going back almost 50 years, and for which documentation no longer exists, the Company must rely on information contained in previous 104(e) responses and information that was gathered during litigation associated with the Charles George Superfund Site. Therefore, the majority of the Company's responses are based on information previously provided to EPA or gathered from the Charles George litigation.

1. General Information About Respondent

**NOTE: all questions in this section refer to the present time unless otherwise indicated.**

- a. Provide the full legal name and mailing address of Respondent.

RESPONSE: Boston Edison Company  
800 Boylston Street  
Boston, MA 02199

b. For each person answering these questions on behalf of the Respondent, provide:

- i. full name;
- ii. title,
- iii. business address; and
- iv. business telephone number.

RESPONSE: Jeffrey N. Stevens, Esq.  
Assistant General Counsel  
NSTAR Electric & Gas Corporation  
800 Boylston Street  
Boston, MA 02199  
(617) 424-2141 (617) 424-2733 fax

Sandra Little  
Director, Environmental Affairs  
NSTAR Electric & Gas Corporation  
One NSTAR Way  
Westwood, MA 02090  
(781) 441-3802 (781) 441-3193 fax

c. If Respondent wishes to designate an individual for all future correspondence concerning this site, including any legal notices, please so indicate here by providing that individuals name, address and telephone number.

RESPONSE: Jeffrey N. Stevens, Esq.  
Assistant General Counsel  
NSTAR Electric & Gas Corporation  
800 Boylston Street  
Boston, MA 02199  
(617) 424-2141 (617) 424-2733 fax

d. Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.

RESPONSE: Cannons Engineering; Silresim Chemical Corporation; Industri-Plex; Landfill & Resource Recovery; PSC Resources; Shaffer Landfill and Peterson Puritan/J.M. Mills.

0004-0004

2. Respondent's Legal Status

**NOTE: All questions in this section refer to the present time unless otherwise indicated.**

- a. If the Respondent has ever done business under any other name;
- i. list each such name; and
  - ii. list the dates during which such name was used by Respondent.

RESPONSE: Since November 1, 2001 Boston Edison Company has been operating under a trade name and therefore has been "doing business as" NSTAR Electric.

- b. If Respondent is a corporation, provide:

- i. the date incorporation;

RESPONSE: 1886

- ii. state of incorporation; and

RESPONSE: Massachusetts

- iii. agent for service of process.

RESPONSE: Richard J. Morrison, Esq.  
Assistant Secretary/Clerk  
NSTAR Electric & Gas Corporation  
800 Boylston Street  
Boston, MA 02199

- c. If Respondent was a business entity other than a corporation, provide:

- i. the type of organization (sole proprietorship, partnership, trust, etc.)
- ii. the date the business began; and
- iii. owner, managing partner, or other equivalent person in charge.

RESPONSE: Not applicable

- d. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not

limited to:

- i. a general statement of the nature of the relationship;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity; and
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

RESPONSE: Boston Edison Company is a Massachusetts corporation. The Company is a wholly owned subsidiary of BEC Energy, a Massachusetts business trust. BEC Energy is a wholly owned subsidiary of NSTAR, a Massachusetts business trust. NSTAR is a publicly-traded, NYSE company. The Respondent was not a subsidiary or otherwise affiliated with another corporation or entity during the period being investigated.

- e. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

RESPONSE: Respondent has no predecessors-in-interest.

- f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:
  - i. the titles and dates of the transactions and copies of documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
  - ii. the identities of the seller, buyer and any other parties to such transactions;
  - iii. a brief statement describing the nature of the asset purchases or mergers; and
  - iv. a brief statement describing and copy(s) of documents embodying any/all indemnification agreements.

RESPONSE: Not applicable

- g. If Respondent had filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition;
- iii. the date the bankruptcy petition was filed;

- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

RESPONSE: Not applicable

3. Respondent's Operations

**NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.**

ALSO NOTE: All questions in this Section refer to facilities owned or operated by the Respondent within Massachusetts, Rhode Island, New Hampshire or Maine and to any other facility owned and operated by Respondent which had any business or other contractual relationship with Whitney Barrel Company.

**Please note that it is not necessary to identify or provide information about any facilities that are engaged in clerical/office work.**

- a. Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations.

RESPONSE: Boston Edison Company is an investor-owned regulated public utility. It supplies electricity at retail to an area of 590 square miles, including the city of Boston and 39 surrounding cities and towns. The population of the area served with electricity at retail is approximately 1.5 million. In 1998 and 1999 the Company's electric generating stations and related properties were sold and therefore Boston Edison no longer owns and operates these facilities. Through 1986 Boston Edison also operated a retail steam business, which was sold in 1986.

The generating stations were located as follows:

Boston Edison's New Boston (formerly known as L Street) Generating Station, 776 Summer Street, South Boston, MA;  
Boston Edison's Mystic Generating Station, 173 Alford Street, Charlestown, MA;  
Pilgrim Nuclear Power Station, RFD 1 Rocky Hill Road, Plymouth, MA;  
Boston Edison's Edgar Station, Weymouth, MA; and  
Boston Edison's Kneeland Street Station, Kneeland Street, Boston, MA.

Boston Edison has a number of service centers strategically located within the communities they serve to facilitate the transmission and distribution of electricity.

The service centers were, or are presently located as follows:

Boston Edison's Massachusetts Avenue Service Center, 1165  
Massachusetts Avenue, Dorchester, MA.  
Woburn Service Center, 285 Locust Street, Woburn, MA;  
Maynard Service Center, Maynard, MA;  
Hyde Park Service Center, Hyde Park, MA;  
Somerville Service Center, 101 Linwood Avenue, Somerville, MA;  
Waltham Service Center, 200 Calvary Street, Waltham, MA;  
Walpole Service Center, 740 Main Street, Walpole, MA;  
Framingham Service Center, 15 Blandin Avenue, Framingham, MA; and  
Watertown Facility, 480 Arsenal Street, Watertown, MA

Boston Edison also has a number of electrical substation locations throughout its service territory. These substations were, or are presently located as follows:

<u>Facility</u>	<u>Location</u>
Station 124	Watertown, MA
Station 467	Watertown, MA
Station 402	Somerville, MA
Station 509	Cambridge, MA
Station 240	Framingham, MA
Station 433	Framingham, MA
Station 455	W. Framingham, MA
Station 146	Walpole, MA
Station 447	Walpole, MA
Station 446	W. Medway
Station 33	Waltham, MA
Station 282	Waltham, MA
Station 211	Woburn, MA
Station 23	Natick, MA
Station 47-2	Canton, MA
Station 470	Canton, MA
Station 456	Dover, MA
Station 478	Holbrook, MA
Station #2	Boston, MA
Station 71	Boston, MA
Station 329	Brighton, MA
Station 53	Boston, MA
Station 483	Dorchester, MA
Station 492	Boston, MA
Station 496	Hyde Park, MA
Station 514	Boston, MA
Station 106	Boston, MA
Station 110	West Roxbury, MA



Station 17  
Station 292  
Station 320

Newton Centre, MA  
Newton Highlands, MA  
Lexington, MA

- b. Provide a brief description of the nature of Respondent's operations at each location including:
- i. the date such operations commenced and concluded;
  - ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and
  - iii. the type of products manufactured, recycled, recovered, treated or otherwise processed in these operations.

RESPONSE: The Generating Stations produced electricity through combustion of fossil fuels (coal, oil, or natural gas), or, in the case of the Pilgrim Nuclear Power Station, the fuel source was enriched uranium. The generating stations operated during the period being investigated however, Edgar Station was closed in the early 1970's and Pilgrim began operating in the early 1970's.

Boston Edison has a number of service centers strategically located within the communities they serve to facilitate the transmission and distribution of electricity. This involves the maintenance of service vehicles and the storing of electrical equipment (including wire, transformers, reclosers, capacitors, poles, meters, insulators, and associated hardware) used in the maintenance of the Company's electrical system. The service center is fully staffed with personnel and maintains stock and equipment in order to perform this function. Prior to 1980, the Mass Ave Service Center was the central repository for the receipt of materials and equipment from other regional service centers and electrical substations for the purposes of treatment, recycling or other disposition. After 1980 the central repository for the receipt of materials and equipment for the purposes of treatment, recycling or other disposition shifted from the Mass Ave facility to the Company's newly opened Watertown facility.

Boston Edison has a number of electrical substations located throughout its service territory. These substations contain various electrical equipment utilized by the Company to transmit or distribute electricity throughout its service territory. The type of work performed at electrical substations consisted of electrical switching, equipment monitoring, and equipment testing/maintenance.

- c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3. a above,

identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:

- i. would have been produced, processed, or used in connection with facility operations; or
- ii. would have been present in materials produced, processed, or used in connection with facility operations.

RESPONSE: The Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. Based on the information contained in Exhibits A & B, the Company is aware of the following chemical constituents listed in Enclosure F of the December 15, 2003 letter: Metals (aluminum, lead, copper, iron) associated with the recycling of wire and other electrical equipment; PCBs may have been a constituent of waste oils; paint thinner; 1,1,1 Trichloroethane; antifreeze; oils; and arsenic, selenium, cadmium, mercury, silver, lead, chromium, and barium in generating station sludge.

- d. If the nature or size of Respondent's operations changed over time, describe those changes, the dates they occurred, and the nature of the current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.

RESPONSE: After 1980 the central repository for the receipt of materials and equipment from other regional service centers, or electrical substations, for the purposes of treatment, recycling or other disposition shifted from the Mass Ave facility to the Company's Watertown facility. Between the 1950's and the 1980's the generating stations added additional turbines and depending upon the years would have utilized different types of fossil fuels (coal, oil, or natural gas). Edgar Station was closed in the early 1970's. The Pilgrim Nuclear Power Station began operations in the early 1970's. As to the electric substations, various construction projects were undertaken during the period of 1950 – 1985 to upgrade these substations. Equipment was replaced and upgraded, new controls were added and the stations were modernized as technology improved.

- e. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

RESPONSE: Boston Edison Company generated electricity. The recycle and/or recovery of waste oil and of wire and various scrap metals have been done as a normal course of business at either the Massachusetts Avenue Service Center or the Watertown location.

- f. In general terms, list the types of raw materials used in the operations.

RESPONSE: The generating stations would have used natural gas, oil or coal or in the case of Pilgrim Nuclear Power Station, enriched uranium. No manufacturing took place at the service centers or electric substations, so no raw materials were utilized.

- g. Describe the cleaning and maintenances of the equipment and machinery involved in these operations, including but not limited to:
- i. the types of material used to clean/maintain this equipment/machinery; and
  - ii. the monthly or annual quantity of each material used.

RESPONSE: Substations – normal station cleaning, janitorial, yard maintenance activities. Type of equipment cleaned would be transformers and circuit breakers. Cleaning is performed prior to painting. Painting is performed on an as needed basis determined by visual inspection of the equipment. Radiators, which are part of a transformer, are routinely washed. Cleaning up, until approximately 1970, was performed using rags and paint thinner to remove oily spots on the equipment. Beginning in the early 1970's transformers are washed using soap and water in a high-pressure spray. There is no information available regarding volumes utilized. Transformers and circuit breakers are routinely maintained. Transformer tap changer overhauls involve: draining the compartment of mineral oil; oil is replaced if necessary; cleaning and inspecting all internal parts; replacement/repair of any damaged parts; reseal the tap changer compartment door; and refill the compartment with the same or new oil. Circuit breaker maintenance involves: draining the compartment of mineral oil; oil is replaced if necessary; cleaning and inspecting all internal parts; check tolerances; lubricate moving parts; and refill the compartment with the same or new oil. The quantity of the materials used is dependant upon the compartment maintained, the voltage class of the equipment, the condition of the mineral oil and the internal components of the transformer or circuit breaker.

Service Centers – normal cleaning, janitorial and maintenance activities were undertaken at these facilities. The only cleaning and maintenance of equipment at the service centers involved the service of trucks as performed by garage personnel. No estimate is readily available concerning the quantity of materials such as oil and filters that may have been used at each facility during the relevant time period.

Generating Stations - disposal of lime sludge, flyash, bottom ash, waste asbestos, and oil saturated filtering clay was performed for Mystic and New Boston Stations. Demineralizer backwash water from Pilgrim Station was routinely picked up and shipped to Mystic Station and Edgar Station for

disposal. The sludge from the generating stations results from the wastewater treatment operations. The wastewater treatment operations are designed to process the following waste streams from the generating units:

1. Boiler blowdowns (water that is drained from boilers)
2. Floor and equipment drains
3. Water treatment wastes (regeneration of the stations demineralizer equipment and cleaning of the station's carbon filters)
4. Air preheater and boiler fireside wash wastes (produced from washing down the furnace and air heater sections of the boiler)
5. Boiler chemical cleaning wastes (produced by cleaning the water side of the boiler tube surfaces)

In treating the wastewater from these sources, many metals, including iron, copper and heavy metals are present due to contact with piping, boiler tubes, mechanical equipment, and products of combustion. Lime is added to the waste stream during treatment in order to promote the precipitation of the metals. Hence the generic designation of these wastewater sludges as "metal hydroxide". These sludges were in a solid state. Fly Ash is the by-product of the combustion of the fossil fuels and would be in a solid state.

- h. Describe the methods used to clean up spills of liquid or solid material during operations, including but not limited to:
- i. the type of materials spilled in operations;
  - ii. the materials used to clean up these spills;
  - iii. the methods used to clean up those spills; and
  - iv. where the materials used to clean up those spills were disposed of.

RESPONSE: Due to the nature and breadth of this request, the Company is still undertaking its review for information responsive to the request and we will supplement our response. Generally, spill cleanup would be performed by the individuals at the Company facilities and the cleanup materials would be sent to the Mass Ave facility or the Watertown facility (depending on the time period involved) for ultimate disposal.

- i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

RESPONSE: The Company does not have a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

- j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

RESPONSE: The Company has been unable to locate any documents indicating that Boston Edison did business with Whitney Barrel Company and other than reference to a customer list, EPA has not provided the Company with any documents that would indicate that the Boston Edison ever did business with Whitney Barrel Company. As part of its due diligence in responding to this Information Request, the Company did consult with individuals working in the Purchasing or Warehousing Departments of the Company to inquire as to whether they could remember doing business with Whitney Barrel Company. No one in Purchasing remembered this vendor or issuing orders to Whitney Barrel Company. One individual in Warehousing and Distribution (Mr. David Costine) indicated that the supplier name sounded familiar. His recollection was that Boston Edison may have purchased some "open top drums" or "storage drums" from Whitney Barrel Company. Boston Edison has employed thousands of employees in any given year during the period being investigated. Many of these employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects.

4. Respondent's Wastes and Waste Streams (including By-Products)

**NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.**

- a. Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

RESPONSE: The Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. Attached as Exhibit A are copies of the Waste Surveys Boston Edison previously provided with its 104(e) responses regarding the Shaffer and Peterson Puritan/JM Mills Superfund Sites. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

- b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
- i. its physical state;
  - ii. it's name and chemical composition;
  - iii. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and

- iv. the dates (beginning and ending) during which type of waste was produced by Respondent's operations.

RESPONSE: As stated in Response 4(a) above, the Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit A.

- c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:
  - i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
  - ii. the colors of the containers;
  - iii. any distinctive stripes or other markings on those containers;
  - iv. any labels or writing on those containers (including the content of those labels);
  - v. whether those containers were new or used;
  - vi. there each type of waste was collected/stored; and
  - vii. if those containers were used, a description of the prior use of the containers.

RESPONSE: The Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. Attached as Exhibit B are copies of the Boston Edison's 104(e) responses regarding the Shaffer and Peterson Puritan/JM Mills Superfund Sites. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

- d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

RESPONSE: As stated in Response 4(c) above, the Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B. There were many individuals within Boston Edison Company who have, or have had, responsibility for particular aspects of the collecting and managing the wastes generated at Boston Edison Company facilities and there is no one person who could be said to have responsibility for all aspects. The individual, during the relevant time, with the greatest centralized responsibility for this function was the Manager of the Company's Materials Department (formerly Stores and Service Department or

Stores Department). The holder of that position (or its equivalent) from 1974 through 1986 was Mr. Joseph Lepore (deceased). Prior to Mr. Lepore it was Mr. Arthur Lynch (deceased). ). The current individual with greatest centralized responsibility for this function is Mr. Paul Rotty, Manager, Warehousing & Distribution.

- e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1985 about its waste managements practices including but not limited to disposal, treatment, storage, recycling, or sale of wastes.

RESPONSE: The Company is not currently aware of the type of information requested. The Company will supplement this response if new information is discovered.

- f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

RESPONSE: There were many individuals within Boston Edison Company who have, or have had, responsibility for particular aspects of the collecting and managing the wastes generated at Boston Edison Company facilities and there is no one person who could be said to have responsibility for all aspects. The individual, during the relevant time, with the greatest centralized responsibility for this function was the Manager of the Company's Materials Department (formerly Stores and Service Department or Stores Department). The holder of that position (or its equivalent) from 1974 through 1986 was Mr. Joseph Lepore (deceased). Prior to Mr. Lepore it was Mr. Arthur Lynch (deceased). ). The current individual with greatest centralized responsibility for this function is Mr. Paul Rotty, Manager, Warehousing & Distribution. The Company has been unable to locate any documents indicating that Boston Edison did business with Whitney Barrel Company and other than reference to a customer list, EPA has not provided the Company with any documents that would indicate that the Boston Edison ever did business with Whitney Barrel Company. As part of its due diligence in responding to this Information Request, the Company did consult with individuals that would have been working in the Purchasing or Warehousing Departments of the Company to inquire as to whether they could remember doing business with Whitney Barrel Company. No one in Purchasing remembered this vendor or issuing orders to Whitney Barrel Company. One individual in Warehousing and Distribution (Mr. David Costine) indicated that the supplier name sounded familiar. His recollection was that Boston Edison may have purchased some "open top drums" or "storage drums" from Whitney Barrel Company.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

**NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.**

**ALSO NOTE: Your response to questions in this section must refer to all locations to which Respondent sent its wastes.**

- a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

RESPONSE: There were many individuals within Boston Edison Company who have, or have had, responsibility for particular aspects of the disposal, storage, treatment, recycling or sale of wastes generated at Boston Edison Company facilities and there is no one person who could be said to have responsibility for all aspects. The individual, during the relevant time, with the greatest centralized responsibility for this function was the Manager of the Company's Materials Department (formerly Stores and Service Department or Stores Department). The holder of that position (or its equivalent) from 1974 through 1986 was Mr. Joseph Lepore (deceased). Prior to Mr. Lepore it was Mr. Arthur Lynch (deceased). The current individual with greatest centralized responsibility for this function is Mr. Paul Rotty, Manager, Warehousing & Distribution. In addition, based on the 1990 deposition testimony of a number of Boston Edison employees (now retired or deceased) in the Charles George Superfund Site litigation, during the period being investigated, the business practice of Boston Edison regarding the handling of drums was that all drums were returned from the various Boston Edison facilities to the Company's Stores & Services Department (located at Mass Ave or Watertown depending on the time period involved) for return of the drums to the original vendor for a credit or refund. The above referenced individuals are as follows:

Joseph A. Lepore, former Staff Assistant to the Vice President –  
Procurement, Stores and Service  
Richard Cronin, former Division Head, Stock Division  
James McGrail, former Senior Transportation Supervisor  
Robert Allen, former Stock Person, Grade A, Stores Department  
Robert Hallissey, former Expediter Inspector, Stores Department

- b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or



empty barrels.

RESPONSE: There were many individuals who have, or have had, some knowledge regarding these subjects. The primary individuals with such knowledge during the relevant time period would be the persons identified in the response 5(a) above.

- c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

RESPONSE: There were many individuals within Boston Edison Company who have, or have had, responsibility for particular aspects of Boston Edison Company's environmental matters. The individual with the most central overall responsibility for such matters is the Director of the Company's Environmental Affairs Department. The current holder of this position with the Company is Sandra Little. Ms. Little has held this position since 1995.

Previous holders of this position (or its equivalent) have been:

1. Mr. Francis Lee from 1979-1995 (except 1993 during a job rotation)
2. Ms. Jerry Purdy 1993
3. Mr. Frank Gottlich 1975-1979 (deceased)
4. Mr. William Irving (1973-1975)

Prior to 1973 Boston Edison Company did not have a specific Department with centralized focus on environmental matters and such responsibility resided with individual operating departments or divisions.

- d. For the previous three responses, also provide each individual's:

- i. job title;
- ii. duties;
- iii. dates performing those duties;
- iv. supervisors for those duties;
- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

RESPONSE: See responses to 5 (a) – (c) above.

- e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes of other markings on those containers;

- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers new or used; and
- vi. if those containers were used, a description of the prior use of the containers.

RESPONSE: As stated in Response 4(a) above, the Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment or recycling.

RESPONSE: The Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

- g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

RESPONSE: See Response 5 (f) above.

- h. State where Respondent sent each type of its waste, including barrels and empty barrels for disposal, treatment or recycling.

RESPONSE: Based on the above referenced deposition testimony in the Charles George litigation, barrels were returned from the various Boston Edison facilities to the Company's Mass Ave or Watertown facility for return to the vendor for a credit. Copies of excerpts from the depositions are attached as Exhibit C. In addition, Boston Edison Teaming Tickets that were retained as part of the Charles George litigation contained a number of tickets detailing the transportation of empty and full drums from the Woburn Service Center or electrical substations located in the Woburn service territory to the Watertown or Mass Ave facilities. These teaming tickets are attached as Exhibit D and provide information from as early as October 9, 1980 through November 10, 1983. As to the remaining part of the request, the Company does not possess any current documentation or information responsive to this

request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B.

- i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

RESPONSE: Based on the testimony contained in Exhibits C and D, barrels would have been transported from various Company facilities, by Boston Edison trucks, back to the Company's Mass Ave or Watertown facility (depending on the time period). As to any other type of waste, the Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

- j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

RESPONSE: See response 5(i) above.

- k. For each type of waste specify which Waste Carrier picked it up.

RESPONSE: See response 5(i) above.

- l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

RESPONSE: See response 5(i) above.

- m. For each type of waste state the volume picked up by each Waste Carrier (per week, month or year).

RESPONSE: See response 5(i) above.

- n. For each type of waste state the dates (beginning and ending) such waste was picked up by each Waste Carrier.

RESPONSE: See response 5(i) above.

- o. Provide copies of all documents containing information responsive to the previous seven questions.

RESPONSE: See response 5(i) above.

- p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

RESPONSE: Unknown

- q. Indicate the ultimate disposal/recycling/treatment location for each type of Waste.

RESPONSE: See response 5(i) above.

- r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

RESPONSE: See response 5(i) above.

- s. Describe how Respondent managed pickups for each waste, including but not limited to:
  - i. the method for inventorying each type of waste;
  - ii. the method for requesting each type of waste to be picked up;
  - iii. the identify of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
  - iv. the amount paid or the rate paid for the pickup of each type of waste;
  - v. the identity of (see Definition) Respondent's employee who paid the bills; and
  - vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup for each type of waste.

RESPONSE: See response 5(i) above.

- t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

RESPONSE: See response 5(i) above.

- u. State the basis for and provide any documents supporting the answer to the previous question.

RESPONSE: See response 5(i) above.

- v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

RESPONSE: The Company does not possess any current documentation or information responsive to this request for the period being investigated. Therefore, in order for the Company to respond to this request the Company must rely upon previous responses to EPA 104(e) requests. See Exhibit B. The Company will continue to seek additional information from other Boston Edison 104(e) Superfund Site responses and we will supplement this response if additional information is discovered.

6. Respondent's Environmental Reporting:

**NOTE: All questions in this section refer to the period being investigated (1950-1985).**

- a. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

RESPONSE: EPA ID Numbers:

<u>LOCATION</u>	<u>ID NUMBER</u>
Somerville	MAV000008130
Waltham	MAV000008128
Walpole	MAV000008132
Framingham	MAV000008133
Mass Ave	MADO76575513
Watertown	MAD000845412
Mystic Station	MAD00842401 (inactive 98)
Medway Station	MAD982544934 (inactive 98)
Edgar Station	MAD00842393 (inactive 98)
Framingham Station 240	MAD982544991 (inactive 98)
New Boston Station	MAD000845420 (inactive 98)
Pilgrim Station	MAD097454599 (inactive 99)
Woburn Garage	MAV000008129
Hyde Park Service Center	MAV000008131
Prudential Building	MAV4000017028

- b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

RESPONSE: EPA Region 1

- c. State the years during which such information was sent/filed.

RESPONSE: Through out the relevant time period

- d. Identify (see Definitions) all state offices to which Respondent had sent or filed hazardous substance or hazardous waste information.

RESPONSE: Massachusetts Department of Environmental Protection

- e. State the years which such information was sent/filed.

RESPONSE: At least since 1982.

- f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq., (TSCA); Emergency Planning and Community Right-To-Know-Act, 42 U.S.C. §§ 1101 et seq., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq. and equivalent state law.

RESPONSE: In Compliance with the requirements of 40 CFR 370.25 (SARA Title III, Section 312), Boston Edison has submitted Tier Two Emergency and Hazardous Chemical Inventory Forms describing hazardous chemical storage at each facility triggering a reporting threshold. Reporting facilities are listed below.

<u>Facility</u>	<u>Location</u>
Pilgrim Nuclear Power Station	Plymouth, MA
Materials Management Center	Watertown, MA
Mystic Station	Charlestown, MA
New Boston Station	South Boston, MA
Station 124	Watertown, MA
Station 467	Watertown, MA
Somerville Service Center	Somerville, MA
Station 402	Somerville, MA
Station 509	Cambridge, MA
Framingham Service Center	Framingham, MA
Station 240	Framingham, MA
Station 433	Framingham, MA
Station 455	W. Framingham, MA
Walpole Service Center	Walpole, MA
Station 146	Walpole, MA

Station 447	Walpole, MA
Station 446	W. Medway
Waltham Service Center	Waltham, MA
Station 33	Waltham, MA
Station 282	Waltham, MA
Station 211	Woburn, MA
Station 23	Natick, MA
Station 47-2	Canton, MA
Station 470	Canton, MA
Station 456	Dover, MA
Station 478	Holbrook, MA
Station #2	Boston, MA
Boston Service Center	Dorchester, MA
Station 71	Boston, MA
Station 329	Brighton, MA
Station 53	Boston, MA
Station 483	Dorchester, MA
Hyde Park Service Center	Hyde Park, MA
Station 492	Boston, MA
Station 496	Hyde Park, MA
Station 514	Boston, MA
Station 106	Boston, MA
Station 110	West Roxbury, MA
Station 17	Newton Centre, MA
Station 292	Newton Highlands, MA
Station 320	Lexington, MA

Biennial Hazardous Waste Reports submitted to DEP for the following locations:

Boston Operations Center	Dorchester
Watertown Materials Management Center	Watertown
Pilgrim Nuclear Power Plant	Plymouth

NPDES were submitted to EPA.

- g. Identify (see Definitions) the federal and state offices to which such information was sent. Provide the full legal name and mailing address of the Respondent.

RESPONSE: EPA Region 1 and MA DEP.

7. Information Concerning Respondent's Association with the Whitney Barrel Company

**NOTE: All questions in this section refer to the period being investigated (1950-1985).**

- a. Please describe Respondent's business association with the Whitney Barrel Company.

RESPONSE: The Company has been unable to locate any documents indicating that Boston Edison did business with Whitney Barrel Company and other than reference to a customer list, EPA has not provided the Company with any documents that would indicate that the Boston Edison ever did business with Whitney Barrel Company. As part of its due diligence in responding to this Information Request, the Company did consult with individuals that would have been working in the Purchasing or Warehousing Departments of the Company to inquire as to whether they could remember doing business with Whitney Barrel Company. No one in Purchasing remembered this vendor or issuing orders to Whitney Barrel Company. One individual in Warehousing and Distribution (Mr. David Costine) indicated that the supplier name sounded familiar. His recollection was that Boston Edison may have purchased some "open top drums" or "storage drums" from Whitney Barrel Company.

- b. Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:
- i. the dates of each pickup and delivery;
  - ii. the type(s) of container(s);
  - iii. the size(s) of the container(s);
  - iv. the condition of each container(s);
  - v. the contents (including but not limited to empty barrel residues) of each container including:
    - (a) the name of each material;
    - (b) the chemical composition of each material;
    - (c) the physical state of each material (e.g., solid, sludge, liquid);
    - (d) the volume of each material; and
  - vi. please include all documentation relating to these transactions.

RESPONSE: See response 7(a) above.

- c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No" please explain. Include but do not



limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
- vi. please include all documentation relating to these transactions.

RESPONSE: See response 7(a) above.

- d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
- vii. please include all documentation relating to these transactions.

RESPONSE: See response 7(a) above.

- e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include in your response to:

- i. the type of services(s);
- ii. the frequency of the service(s)
- iii. the date(s) of service(s); and
- iv. please include any documentation relating to these transactions.

RESPONSE: See response 7(a) above.

- f. Did Respondent ever pick up materials from other parties which were taken directly or indirectly to the Whitney Barrel Company (to be referred to as "customers" for purposes of this Information Request)? Unless your answer is an absolute "No", please explain.

RESPONSE: No.

- g. Identify (see Definitions) all persons and entities from whom Respondent picked up materials which were taken directly or indirectly to the Whitney Barrel Company.

RESPONSE: Not Applicable.

- h. In addition to providing a list that identified all such customers, provide for each pickup and delivery of materials to the Whitney Barrel Company:
- i. the dates of each pickup and delivery;
  - ii. the type of container(s);
  - iii. the size of the container(s);
  - iv. the condition of each container(s);
  - v. for each customer's materials taken to the Whitney Barrel Company describe:
    - (a) the nature of each material;
    - (b) the chemical composition of each material;
    - (c) the physical state of each material (e.g., solid, liquid);
    - (d) the volume of each material; and
  - vi. please include all documentation relating to your pickup and delivery of materials to the Whitney Barrel Company

RESPONSE: Not Applicable.

- i. Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

RESPONSE: See Response 7(a) above.

8. Information About Others

- a. If you have information concerning the operation of the Site or the source, content of quantity of materials placed/disposed of at the Site which is not included in the information you have already provided, provide all such information.

RESPONSE: Respondent has no additional information regarding the operation of the Site or the source, content or quantity of materials disposed of at the Site, which is not already included herein.

- b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

RESPONSE: Respondent has no reason to believe that there are additional individuals, not already mentioned herein, that may be able to provide additional information.

- c. If not provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

RESPONSE: Respondent is unaware of any additional person, not already mentioned herein, that may be able to provide additional information.

9. Compliance With This Request

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
  - i. the names of all individuals consulted;

RESPONSE: Jeffrey N. Stevens, Assistant General Counsel  
Sandra Little, Director, Environmental Affairs  
Pamela Szatek, Director, Procurement  
Paul Rotty, Manager, Warehouse & Distribution  
David Costine, Supervisor, Warehouse & Distribution  
Stephanye Fullard, Supervisor, Accounts Payable

- ii. the current job title and job description of each individual consulted;

RESPONSE: Assistant General Counsel is responsible for providing legal counsel and assistance to the corporation in its day-to-day operations.  
Director, Environmental Affairs is responsible for overseeing the Company's administration and compliance with state and federal environmental laws.

Director, Procurement is responsible for overseeing the Company's contracting for goods and services.  
Manager, Warehousing & Distribution is responsible for overseeing the Company's handling and disposal of hazardous waste.  
Supervisor, Warehousing & Distribution reports to the Manager, Warehousing & Distribution.  
Supervisor, Accounts Payable is responsible for overseeing the receipt of invoices and payments to vendors hired by the Company.

iii. the job title and job description during the period being investigated of each individual consulted;

RESPONSE: The same individuals that are listed in subsection (i) and (ii) of this section were the individuals consulted for the investigation.

iv. whether each individual consulted is a current or past employee of Respondent;

RESPONSE: All employees consulted in preparation of this document are current employees.

v. the names of all divisions or offices of Respondent for which records were reviewed;

RESPONSE: Corporate Legal Department  
Environmental Affairs Department  
Procurement Department  
Warehousing & Distribution  
Accounts Payable

vi. the nature of all documents reviewed;

RESPONSE: The reviewed documents were documents created in the regular course of the company's business. The Company checked current Passport Records for Supplier name and no records for Whitney Barrel were found. The Company checked MAPPS 1997 Supplier Conversion Records for the Boston Edison Company Passport System Implementation, which located an "Inactive Vendor Listing" showing suppliers that did not have any activity with Boston Edison during the prior 18-months and Whitney Barrel did not appear on the list. The Company checked Iron Mountain Records for old Purchase Orders/Contracts. The oldest records on file with Iron Mountain dated back to 1994. Any record prior to that date would have been destroyed based on records retention requirements for these types of documents. Accounts Payable records also are not retained for the period being

investigated. The Company also reviewed its 104(e) responses submitted to EPA regarding the Shaffer Landfill, and Peterson Puritan/J.M. Mills and Landfill & Resource Recovery Superfund sites. Finally, the Company reviewed various deposition transcripts of various Boston Edison employees and retirees from the litigation involving the Charles George Superfund Site. The Company's search for documents and information relative to those matters took place as early as 1989 and is the most accurate of information and documentation in the Company's possession due to normal document retention practices. Copies of the Company's 104(e) responses to the above referenced matter and excerpts from the deposition transcripts in the Charles George litigation can be found at Exhibits B and C.

vii. the locations where those documents reviewed were kept prior to review; and

RESPONSE: The reviewed documents were maintained either in the Corporate Legal Department, the Environmental Affairs Department, the Procurement Department, or the Company's offsite document storage contractor (Iron Mountain).

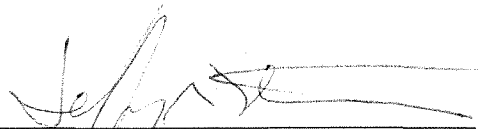
viii. the location where those documents reviewed are currently kept.

RESPONSE: The reviewed documents are currently kept in the Corporate Legal Department, the Environmental Affairs Department, the Procurement Department, or with the Company's offsite document storage contractor (Iron Mountain).

## DECLARATION

I declare under penalty of perjury that I am authorized to respond to the subject information request on behalf of Boston Edison Company and that based on investigation and inquiry I believe the foregoing response to be complete, true, and correct.

Executed on March 2, 2004

A handwritten signature in dark ink, appearing to read "Jeffrey N. Stevens", is written over a horizontal line.

Jeffrey N. Stevens

Assistant General Counsel

**EXHIBIT A**

**RESPONSE OF BOSTON EDISON COMPANY  
TO EPA REQUEST FOR INFORMATION  
PURSUANT TO § 104 OF CERCLA  
IN RELATION TO THE FORMER WHITNEY  
BARREL COMPANY  
AT THE WELLS G & H SUPERFUND SITE IN  
WOBURN, MA**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

## Information Request Waste Survey

Name of Respondent: Boston Edison CompanyRespondent's Location: Mass Ave Service CenterDate: 1/31/03

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Acids				
	Adhesives				
	Asbestos				
	Adsorbents (from spills, leaks, etc.)				
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				



	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Oils				
	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	solutions				
	other:				
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				
	inks				
	dyes				
	other:				
	Rags, Used (Indicate prior use)				
	Rodenticides				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Septic System Wastes				
*	Sludges	sludge/55 gal drums	Not Known	Not Known <sup>See</sup> Exhibit 2	55 gallon drums Recycling Inc.
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
	Waste Oils				
	Wood Preservatives				
	Other:				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

Information Request Waste Survey

Name of Respondent: Boston Edison Company

Respondent's Location: Mystic + New Boston

Date: 1/31/03

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Acids				
	Adhesives				
	Asbestos				
	Adsorbents (from spills, leaks, etc.)				
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Oils				
	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				



	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	solutions				
	other:				
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				
	inks				
	dyes				
	other:				
	Rags, Used (Indicate prior use)				
	Rodenticides				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Septic System Wastes				
X	Sludges	Solid / Lig dumpster or box or 55 gal drum	Not Known	See Attachment 2	Box or dumpster (77-80) Recycling 55 Gal drums (77-80) Industries
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
	Waste Oils				
	Wood Preservatives				
X	Other:				
	Fly Ash	Solid / dumpster	Not Known	See Attachment 2	dumpster (77-80) Recycling Industries



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

Information Request Waste Survey

Name of Respondent: Boston Edison Company

Respondent's Location: Station 211/34

Date: 9-7-93

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-'68), [Name] Landfill ('69-'81), [Name] Solvent Reclaimer ('82-'91).
	Acids				
	Adhesives				
	Asbestos				
*	Adsorbents (from spills, leaks, etc.)	Solid / e.g. speedy dry, booms, various forms in drums	Not Known	Not Known	Returned in drums to Watertown '80-'86, to Mass Ave. '40-'80
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				
	Oils				
	Oil Filters				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-'68), [Name] Landfill ('69-'81), [Name] Solvent Reclaimer ('82-'91)).
	Transmission fluids				
	other:				
*	Batteries	Solid / Station control batteries, lead, acid	Exide, CND / Not Known	Extremely Infrequent	Recycled, Returned to Mass Ave. '40 - '86
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
	Etching Solutions				
*	Filters	Fiber Air Filters	Fiberglass	One per month	Dumpster '80 - '86
	Flammable, Reactive, or Explosive Materials				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-'68), [Name] Landfill ('69-'81), [Name] Solvent Reclaimer ('82-'91).
	Fungicides				
	Herbicides				
	Insecticides				
*	Insulating/Fire Proofing Materials	-Solid / Tape -Solid / e.g. switch coats, rubber blankets	Not Known / Unavailable  Not Known	Not Known  Extremely Infrequent	Not Known  Dumpster '65- '86
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
	other:				
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				



	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
*	thinner	Liquid / One Gallon container	'70-'86 / '40-'70 Thinx / Solvident	Unavailable	Reused at Mass Ave. OR Returned to Mass Ave. '40-'86
	turpentine				
	varnish				
	other:				
*	PCBs (polychlorinated biphenyls)	May be a constituent of waste oils; See waste oils			
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpter.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpter ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	inks				
	dyes				
	other:				
*	Rags, Used (Indicate prior use)	Solid / prior use wiping down equipment, washing, general cleanup	Not Applicable	Not Known	oily rags in drums returned to Watertown. '80-'86; to Mass Ave. '40-'79
	Rodenticides				
	Septic System Wastes				
	Sludges				
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
*	Waste Oils	Liquid / Drained from equipment into drums and/or tankers	Not Known	Not Known	Returned to Watertown '80-'86 to Mass Ave. '40-'79
	Wood Preservatives				
	Other:				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I

Information Request Waste Survey

Name of Respondent: Boston Edison

Respondent's Location: Woburn

Date: 9-7-93

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Acids				
	Adhesives				
	Asbestos				
*	Adsorbents (from spills, leaks, etc.)	Solid/e.g. speedy-dry, booms, various forms in drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; Returned in drums to Mass Ave. '57-'80
	Automotive Related Wastes:				
*	Antifreeze	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '57-'80
*	Batteries	Solid/e.g. cars and trucks	Not Known	Not Known	Recycled '57-'86
*	Brake Fluids	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '57-'80
	Degreasers				
	Lubricants				
*	Oils	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '57-'80
*	Oil Filters	Solid/e.g. cars and trucks	Not Known	Not Known	Dumpster '57-'82 Recycled '82-'93

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
*	Transmission fluids	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '57-'80
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
*	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
*	other:	Solid/e.g. wire, lampheads	Not Known	Not Known	Recycled '57-'93
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O. )	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	thinner				
	turpentine				
	varnish				
	other:				
*	PCBs (polychlorinated biphenyls)	May be a constituent of oil See waste oils			
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	inks				
	dyes				
	other:				
*	Rags, Used (Indicate prior use)	Solid / prior use - wiping down equipment, general cleanup	Not Applicable	Not Known	oily rags in drums returned to Watertown '80-'86; returned to Mass Ave '57-'80
	Rodenticides				
	Septic System Wastes				
	Sludges				
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
*	Waste Oils	Liquid / contained within electric equipment	Not Known	Not Known	Sent to Watertown '80-'86, to Mass Ave. '57-'80: repair, salvage, disposal
	Wood Preservatives				
	Other:				





# Attachment 4 (Response 2a)

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

### Information Request Waste Survey

Name of Respondent: Boston Edison Company      Respondent's Location: Somerville S.C.      Date: 9-7-93

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Acids				
	Adhesives				
	Asbestos				
*	Adsorbents (from spills, leaks, etc.)	Solid/e.g. speedy dry, booms, various forms in drums.	Not Known	Not Known	Returned in drums to Watertown '80-'86; Returned in drums to Mass Ave. '63-'80
	Automotive Related Wastes:				
*	Antifreeze	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '63-'80
*	Batteries	Solid/e.g. cars and trucks	Not Known	Not Known	Recycled '63-'86
*	Brake Fluids	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '63-'80
	Degreasers				
	Lubricants				
*	Oils	Liquid/e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '63-'80
*	Oil Filters	Solid/e.g. cars and trucks	Not Known	Not Known	Dumpster '63-'82 Recycled '82-'93

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
*	Transmission fluids	Liquid / e.g. 55 gallon drums	Not Known	Not Known	Returned in drums to Watertown '80-'86; to Mass Ave. '63-'80
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
	Etching Solutions				
	Filters				
	Flammable, Reactive, or Explosive Materials				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Fungicides				
	Herbicides				
	Insecticides				
*	Insulating/Fire Proofing Materials	Solid / tape, paste	Not Known / unavailable	Not Known	Dumpster prior to '86 Landfill after '86
	Laboratory Wastes				
	Lubricants				
*	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
*	other:	Solid / e.g. wire, Lamp Heads	Not Known	Not Known	Recycled '63-'93
	Paint and Coating Wastes:				
	paint				
	pigments				
	stripper				
	stains				

0004-0060

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O. )	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-60), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	thinner				
	turpentine				
	varnish				
	other:				
*	PCBs (polychlorinated biphenyls)	May be a constituent of waste oil; See Waste Oil			
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	inks				
	dyes				
	other:				
*	Rags, Used (Indicate prior use)	Solid/ prior use: wiping down equipment, general cleanup	Not Applicable	Not Known	Oily rags in drums returned to Watertown '80-'86 returned to Mass Ave. '63-'79
	Rodenticides				
	Septic System Wastes				
	Sludges				
*	Soldering Solutions	Solid/ contained within electric joint	Not Known	Not Known	Dumpster
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				
	Solvents				
*	Waste Oils	Liquid/ contained within electric equipment	Not Known	Not Known	Sent to Watertown, '80-'86, to Mass Ave. '57-'80: repair, salvage, disposal
	Wood Preservatives				
	other:				



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
NEW ENGLAND  
1 CONGRESS STREET, SUITE 1100,  
BOSTON, MA. 02114-2023**

**DATE:** December 17, 2003 (Memo to File)

**FROM:**  
Search & Cost Recovery Section

**TO:** File

**SUBJ.:** (Interview) SSID #  
(Wells G & H)

**MEMORANDUM**

**ENFORCEMENT CONFIDENTIAL**  
**ATTORNEY/CLIENT PRIVILEGE**

Person Interviewed:

On Wednesday, December 10, 2003, I traveled to North Reading, Massachusetts to meet with the above-named individual. Upon arrival, I was greeted at the door by a gentleman that introduced himself as . I identified myself to him and advised him as to why I was there. He invited me in by way of side stairs. Upon entering, I was greeted by , she invited me into the dining area, where was already seated. advised me of the following:

1. He worked at Whitney Barrel at 256 Salem Street, Woburn, MA from around 1957 until 1982. This was from the time he was 17 years of age for 25 years, off and on.
2. He performed many functions while there. He drove truck for pick up and delivery of barrels and tanks to and from Whitney Barrel, worked with the tank salvaging outfit at Whitney Barrel, and he was a welder for Whitney Barrel, wherein he repaired the damaged tanks



that came in.

3. He picked up barrels from a "light company" on Massachusetts Avenue in Boston, it could have been the Boston Edison Company. Does not recall the quantity of barrels or the frequency. These barrels were brought to Whitney Barrel.

8. Some of the barrels coming in for recycling came in with rubber linings, hazardous material warning labels. We knew this was "bad stuff" because of the labels. We would take these barrels down the back road (Woburn Road) and dump the contents in the sand. This was done on a regular basis but not too often. In other words, it was part of the process. These barrels were brought to Whitney Barrel.

10. The barrels that went inside to the process with residue in them were dumped into the floor drain. This was an approximately 3-foot grated hole located basically in the middle of the floor. "Everything" went down this drain and this drain went from the floor out to the sewer overflow.





800 Boylston Street Boston, Massachusetts 02199

**Jeffrey N. Stevens, Esq.**  
Assistant General Counsel

Phone No. (617) 424-2141  
Fax No. (617) 424-2733  
E-mail: jeffrey\_stevens@nstaronline.com

March 1, 2007

**VIA HAND DELIVERY**

U.S. Environmental Protection Agency  
Martha Bosworth, Enforcement Coordinator  
Office of Site Remediation and Restoration (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114  
ATTN: Wells G&H Case Team

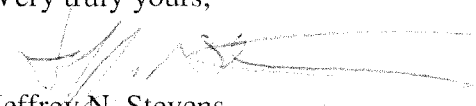
Re: Supplemental Request for Information Pursuant to Section 104 of  
CERCLA in relation to the former Whitney Barrel Company at the Wells  
G & H Superfund Site in Woburn, MA.

Dear Ms. Bosworth:

Boston Edison Company hereby responds to the above-referenced supplemental information request dated January 4, 2007. Based on telephone conversations with EPA Attorney Susan Scott the time period for submittal of this response was extended to March 2, 2007.

Should EPA have any questions concerning this response, please contact me at (617) 424-2141.

Very truly yours,



Jeffrey N. Stevens  
Assistant General Counsel

Enclosures

cc: Susan Scott, Esquire EPA w/out enclosures

0004-0351

**SUPPLEMENTAL RESPONSE  
OF BOSTON EDISON COMPANY  
TO EPA'S SUPPLEMENTAL REQUEST FOR INFORMATION  
PURSUANT TO § 104 OF CERCLA  
IN RELATION TO THE FORMER WHITNEY BARREL COMPANY  
AT THE WELLS G & H SUPERFUND SITE IN WOBURN, MA**

This response is submitted by Boston Edison Company<sup>1</sup> ("Boston Edison" or the "Company") to the "Supplemental Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, MA," which was issued by the United States Environmental Protection Agency (EPA) by letter dated January 4, 2007.

EPA's January 4, 2007 letter states that EPA has information associating Boston Edison with the Whitney Barrel Company, 256 Salem Street, Woburn, MA ("Whitney Barrel") situated within the Wells G & H Superfund Site in Woburn, MA (the "Site"). As EPA's cover letter states, documentation available to EPA indicates that Boston Edison Company sent used drums containing transformer oil and possibly other hazardous materials to the former Whitney Barrel for reconditioning. EPA's correspondence contains two deposit slips showing transactions between Boston Edison and Whitney Barrel. EPA has also provided excerpts from an interview and a deposition with two former Whitney Barrel employees indicating that Whitney Barrel picked up used barrels containing transformer oil believed to be from Boston Edison. Based on this documentation, EPA would like to obtain further information from the Company regarding the types and quantities of materials used and wastes generated by Boston Edison and the Company's relationship to the former Whitney Barrel. As such, EPA has requested that the Company supplement its March, 2004 response to EPA's original Section 104(e) Information Request, focusing on reviewing and supplementing, as necessary, the Company's responses to all sections of questions 3, 4, 5, and 7. The period being investigated is from 1950 through 1985.

With the receipt of the above referenced additional information provided by EPA, Boston Edison undertook a further investigation regarding possible dealings between Boston Edison and Whitney Barrel. As was the case with its initial effort in responding to EPA's original Information Request, the Company was unable to locate any documents indicating that the Company did business with Whitney Barrel. As part of its due diligence the Company contacted additional current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. Based on conversations with several individuals, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Company's Service Center located at 1165 Massachusetts Avenue, Dorchester, Massachusetts (the "Mass Ave Facility"). According to the recollections of these current employees and retirees, these services consisted of the pick-up of empty barrels from the Company's transformer oil

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<sup>1</sup> Effective January 1, 2007, Boston Edison Company changed its name to NSTAR Electric Company.

reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil (and one individual recalled that on some occasions liquid lubricants such as kerosene). The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

Based on the information provided by EPA and the information provided by the Company's employees and retirees, Boston Edison provides the following supplemental responses pertaining to its Service Center located at 1165 Massachusetts Avenue, Dorchester, Massachusetts and more specifically regarding the Oil House and the barrels that previously contained transformer oil or kerosene. It should be noted that, due to the lack of specific documentation relative to Whitney Barrel or the Site and the fact that the information request seeks a vast quantity of detailed information for a 35 year time period going back more than 50+ years, and for which documentation no longer exists, the Company's supplemental responses are based on the recollections of individuals who have been retired from the Company for upwards of 25 years.

Finally, the Company is providing a supplemental response to each specific request (and their sub-parts) that requires a supplemental response based on the additional information supplied by the Company's employees and retirees regarding Whitney Barrel and the barrel reconditioning services provided by Whitney Barrel at Boston Edison's Mass Ave Facility. Boston Edison believes that all other responses contained in the Company's March 2004 response do not require supplementation.

1. General Information About Respondent

- a. Provide the full legal name and mailing address of Respondent.

SUPPLEMENTAL RESPONSE:

NSTAR Electric Company  
800 Boylston Street  
Boston, MA 02199

2. Respondent's Legal Status

- a. If the Respondent has ever done business under any other name;

- i. list each such name; and
- ii. list the dates during which such name was used by Respondent.

SUPPLEMENTAL RESPONSE: Effective January 1, 2007 Boston Edison Company changed its name to NSTAR Electric Company.

3. Respondent's Operations

- c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3 a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:
  - i. would have been produced, processed, or used in connection with facility operations; or
  - ii. would have been present in materials produced, processed, or used in connection with facility operations.

SUPPLEMENTAL RESPONSE: The Company does not possess any current documentation responsive to this request for the period being investigated. However, based on the information provided by the Company's current or retired employees regarding the barrel reclamation services performed by Whitney Barrel at the Company's Mass Ave Facility, the Company is aware of the following chemical constituents listed in Enclosure F of the EPA's letter: PCBs may have been a constituent of transformer oils; waste oils.

- j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

4. Respondent's Wastes and Waste Streams (including By-Products)

- a. Complete the enclosed "Waste Survey" checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

SUPPLEMENTAL RESPONSE: See attached Waste Survey for the Mass Ave Facility regarding used transformer oil and the barrels associated with same.

- b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
- its physical state;
  - it's name and chemical composition;
  - the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
  - the dates (beginning and ending) during which type of waste was produced by Respondent's operations.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any documents, however, based on the recollections of the current employees and retirees interviewed, the following information was provided:

- Used transformer oil would arrive at the Mass Ave Facility from the field as a result of maintenance and/or repair being performed on electrical equipment.
- Used oil was also drained into drums as a result of network and distribution transformers being serviced and repaired in Building #2.
- The used oil drums were moved to the oil house where the transformer oil was transferred into a tank for processing.
- Empty drums would then be sent out to be cleaned.
- Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility.
- These services consisted of the pick-up of empty 55-gallon barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and

painting of these barrels (they were painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility.

- The barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene.
  - Barrels that contained product other than transformer oil would be returned to the applicable vendor, as these drums typically had return deposits.
  - The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison.
  - The Company was not able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.
- c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:
- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
  - ii. the colors of the containers;
  - iii. any distinctive stripes or other markings on those containers;
  - iv. any labels or writing on those containers (including the content of those labels);
  - v. whether those containers were new or used;
  - vi. where each type of waste was collected/stored; and
  - vii. if those containers were used, a description of the prior use of the containers.

SUPPLEMENTAL RESPONSE: Based on information provided by current and former employees, the following is a description of how used transformer oil was managed at the Mass Ave Facility. Used transformer oil would arrive at the Mass Ave Facility from the field as a result of maintenance and/or repair being performed on electrical equipment. Used oil was also drained into drums as a result of network and distribution transformers being serviced and repaired in Building #2. The used oil drums were moved to the oil house where the transformer oil was transferred into a tank for processing. Empty drums would then be sent out to be cleaned. Around 1980 Boston Edison bought a mobile oil treatment plant to use in the field at stations. This resulted in significantly less use for the oil house at the Mass Ave Facility. By 1985, the mobile treatment plant was replaced by the oil house at the new Watertown Facility which also was designed to process transformer oil.

Upon information and belief, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility. According to



the recollections of the current employees and retirees, these services consisted of the pick-up of empty 55-gallon barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (they were painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene. Barrels that contained product other than transformer oil would be returned to the applicable vendor, as these drums typically had return deposits.

The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

- d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 3(j).

- f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel.

Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer;

Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

- a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

SUPPLEMENT RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

- b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

SUPPLEMENTAL RESPONSE: See Supplemental Response 5(a).

- c. For the previous three responses, also provide each individual's:
  - i. job title;
  - ii. duties;
  - iii. dates performing those duties;
  - iv. supervisors for those duties;

- v. current position or, if such individual is no longer employed by Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

SUPPLEMENTAL RESPONSE: See Supplemental Response 5(a).

- e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:
  - i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
  - ii. the colors of the containers;
  - iii. any distinctive stripes or other markings on those containers;
  - iv. any labels or writing on those containers (including the content of those labels);
  - v. whether those containers new or used; and
  - vi. if those containers were used, a description of the prior use of the containers.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment or recycling.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- h. State where Respondent sent each type of its waste, including barrels and empty barrels for disposal, treatment or recycling.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- k. For each type of waste specify which Waste Carrier picked it up.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- m. For each type of waste state the volume picked up by each Waste Carrier (per week, month or year).

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- n. For each type of waste state the dates (beginning and ending) such waste was picked up by each Waste Carrier.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- o. Provide copies of all documents containing information responsive to the previous seven questions.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

SUPPLEMENTAL RESPONSE: Unknown

- q. Indicate the ultimate disposal/recycling/treatment location for each type of Waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents.

- s. Describe how Respondent managed pickups for each waste, including but not limited to:
- i. the method for inventorying each type of waste;
  - ii. the method for requesting each type of waste to be picked up;
  - iii. the identify of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
  - iv. the amount paid or the rate paid for the pickup of each type of waste;
  - v. the identity of (see Definition) Respondent's employee who paid the bills; and
  - vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup for each type of waste.

SUPPLEMENTAL RESPONSE: See Supplemental Response 4(c).

- t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

SUPPLEMENTAL RESPONSE: Upon information and belief, Whitney Barrel determined that the barrels would be reconditioned at Whitney Barrel's place of business.

- u. State the basis for and provide any documents supporting the answer to the previous question.

SUPPLEMENTAL RESPONSE: Boston Edison has not been able to locate any such documents. The basis for the response to 5(u) is common sense given the fact that Whitney Barrel had their place of business.

- v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did

business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

7. Information Concerning Respondent's Association with the Whitney Barrel Company

- a. Please describe Respondent's business association with the Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: As was the case with its initial effort in responding to EPA's original Information Request, the Company was unable to locate any documents indicating that the Company did business with Whitney Barrel. As part of its due diligence the Company contacted additional current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. Based on conversations with several individuals, it does appear that Boston Edison used Whitney Barrel for barrel reconditioning services at the Mass Ave Facility. According to the recollections of these current employees and retirees, these services consisted of the pick-up of empty barrels from the Company's transformer oil reclamation facility (the so-called "Oil House") located at the Mass Ave Facility; the washing, cleaning and painting of these barrels (painted yellow); and the return of the reconditioned barrels to the Mass Ave Facility. According to the recollection of the Company's employees or retirees, the barrels picked-up by Whitney Barrel were empty, however, these barrels had previously contained transformer oil and on some occasions liquid lubricants such as kerosene. The Company was not able to determine with any degree of certainty the years in which Whitney Barrel provided barrel reconditioning services for Boston Edison. Nor was the Company able to determine with any certainty the frequency of these services. One individual's recollection was that Whitney Barrel may have come to the Mass Ave Facility once a month for pick-up and/or drop-off of barrels. Another individual's recollection was that it could have been once or twice a month.

- b. Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:

0004-0362

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);  
the size(s) of the container(s);
- iv. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including:
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
  - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No" please explain. Include but do not limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
  - (a) the name of each material;
  - (b) the chemical composition of each material;
  - (c) the physical state of each material (e.g., solid, sludge, liquid);
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s)
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including:
  - (a) the name of each material;

- (b) the chemical composition of each material;
- (c) the physical state of each material (e.g., solid, sludge, liquid);
- vi. please include all documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: Yes, based on the information provided by the Company's employees and retirees.

- i. Unknown
  - ii. Metal barrels
  - iii. 55 gallons
  - iv. Good
  - v.
    - (a) transformer oil residues and possibly kerosene residues
    - (b) unknown
    - (c) liquid
  - vi. Other than the two pages provided by EPA, the Company has been unable to locate any documentation relating to these transactions.
- e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include in your response to:
- i. the type of services(s);
  - ii. the frequency of the service(s)
  - iii. the date(s) of service(s); and
  - iv. please include any documentation relating to these transactions.

SUPPLEMENTAL RESPONSE: No, based on the information provided by the Company's employees and retirees.

- i. Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

SUPPLEMENTAL RESPONSE: Many of the Company's employees, by the nature of their job duties, would have some knowledge of or information about the subject matter of any of the foregoing questions and there is no one person who could be said to have responsibility for all aspects. As such, it is impossible for the Company to identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of this question. Notwithstanding the above, as part of its due diligence the Company did contact several current employees and retirees who may have had knowledge of Whitney Barrel, if in fact Boston Edison did business with them. The following former or current employees had knowledge of or information about the subject matter of Whitney Barrel's services with Boston Edison:

0004-0364



Joe Lepore (retiree) – former Superintendent, Stores Department; Joe Clifford (retiree) – former Stockman; Bob Shine (retiree) – former Supervisor; John O'Sullivan (retiree) – former Inventory Clerk and Trucking Department; Tom Zazulak (employee) – Principal Engineer; Fred Darling (retiree); Joe Coyne (retiree) – former Stockman and Inspector; Harold Standring (retiree) – former Chemist.

9. Compliance With This Request

- a. If not already provided in response to the questions above, describe all sources reviewed or consulted in responding to this request, including but not limited to:
  - i. the names of all individuals consulted;
  - ii. the current job title and job description of each individual consulted;
  - iii. the job title and job description during the period being investigated of each individual consulted;
  - iv. whether each individual consulted is a current or past employee of Respondent;
  - v. the names of all divisions or offices of Respondent for which records were reviewed;
  - vi. the nature of all documents reviewed;
  - vii. the locations where those documents reviewed were kept prior to review; and
  - viii. the location where those documents reviewed are currently kept.

SUPPLEMENTAL RESPONSE: The information is already provided in the responses to the questions, above.

## DECLARATION

I declare under penalty of perjury that I am authorized to respond to the subject supplemental information request on behalf of NSTAR Electric Company f/k/a Boston Edison Company and that based on investigation and inquiry I believe the foregoing response to be complete, true, and correct.

Executed on March 1, 2007

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Sandra J. Little

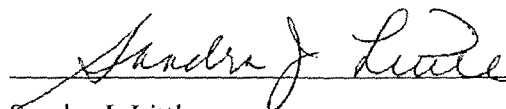
Director, Environmental Affairs Department

NSTAR Electric & Gas Corporation

## DECLARATION

I declare under penalty of perjury that I am authorized to respond to the subject supplemental information request on behalf of NSTAR Electric Company f/k/a Boston Edison Company and that based on investigation and inquiry I believe the foregoing response to be complete, true, and correct.

Executed on March 1, 2007

A handwritten signature in cursive script, reading "Sandra J. Little", is written over a horizontal line.

Sandra J. Little

Director, Environmental Affairs Department  
NSTAR Electric & Gas Corporation

0004-0367

## ENCLOSURE E-WASTE SURVEY

Name of Respondent: Boston Edison Company

Respondent's Location: Miss Ave Facility Date: 3/1/07

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Acids				
	Adhesives				
	Asbestos				
	Adsorbents (from spills, leaks, etc.)				
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				
	Oils				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				
Etching Solutions				
Filters				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
X	Lubricants	liquid - residue in empty 55 gal drums	KEROSENE	unknown	drums returned by shipping barrel yards unknown
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
	other:				
	Paint and Coating Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)	liquid residue in 55 gal barrels	unknown	unknown - may have been a constituent of several unknown liquids	barrels sent to landfill by [Name] Landfill('69-81)
	Pesticides			empty barrels	
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				

Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO <sub>3</sub> , Tetrahydrofuran/C <sub>4</sub> H <sub>8</sub> O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster('55-68), [Name] Landfill('69-81), [Name] Solvent Reclaimer('82-'91).
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				





UNITED STATES DISTRICT COURT  
For the District of Massachusetts

-----  
ANNE ANDERSON, ET AL.,  
Plaintiffs

VS.

CRYOVAC, INC., ET AL.,  
Defendants  
-----

Civil Action  
No. 82-1672-S

Deposition of ANTHONY CARCHIDE, a witness  
called on behalf of the Plaintiffs, pursuant to the  
provisions of the Massachusetts Rules of Civil  
Procedure, before Lisa McDonald, a Certified Shorthand  
Reporter and Notary Public in and for the Commonwealth  
of Massachusetts, at the Law Office of Schlichtmann,  
Conway & Crowley, 171 Milk Street, Boston,  
Massachusetts, on Wednesday, January 22, 1986,  
commencing at 10 a.m.

Lisa McDonald  
Certified Shorthand Reporter  
162 Lebanon Street  
Malden, MA 02148  
(617) 321-6348

ERRATA SHEET

1 Name: \_\_\_\_\_ Date: \_\_\_\_\_  
2 Case Name: \_\_\_\_\_ Case No.: \_\_\_\_\_  
3 Day/Date of Deposition: \_\_\_\_\_  
4

5	PAGE	LINE	CORRECTION
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1       **APPEARANCES:**

2               ROYOVIN, HUGE & LENZNER  
3               By David Geronemus, Esquire  
4               1730 Rhode Island Ave., N.W.  
5               Washington, D.C. 20036  
6                       Attorney for Plaintiff

7               HALE & DORR  
8               By Jerome P. Facher, Esquire  
9               and Deborah Fawcett, Attorney  
10              60 State Street  
11              Boston, Massachusetts 02109  
12                       Attorneys for Beatrice Foods

13              FOLEY, HOAG & ELIOT  
14              By William Welch, Esquire  
15              One Post Office Square  
16              Boston, Massachusetts 02109  
17                       Attorney for W.R. Grace

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20  
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## I N D E X

<u>Witness</u>	<u>Direct</u>	<u>Cross</u>	<u>Redirect</u>	<u>Recross</u>
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ANTHONY CARCHIDE

By Mr. Geronemus	4		70	
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By Mr. Facher		57		72
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## E X H I B I T S

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PROCEEDINGS:

MR. GERONEMUS: Let me put our stipulations on the record. See if I get them right. We are reserving all objections except as to form until the time of trial and that includes motions to strike. We are going to waive the notarization requirement and the witness will sign under penalty of perjury which is what I explained to you a moment ago is signing under oath.

ANTHONY CARCHIDE

A witness called for examination, having been duly sworn, testified as follows:

DIRECT EXAMINATION

BY MR. GERONEMUS:

Q Could you state and spell your full name, please?

A Anthony. You want me to spell the first name or --

Q Just the second name.

A C-a-r-c-h-i-d-e.

Q And your current address?

A 480 Washington Street in Woburn.

Q And your current employment?

A I'm a janitor at Digital, Incorporation in Woburn.

1 Q Mr. Carchide --

2 MR. FACHER: Is that Digital Equipment?

3 THE WITNESS: Yes.

4 Q Mr. Carchide, have you ever worked at the Whitney  
5 Barrel Company?

6 A Yes.

7 Q And for what period of time did you work for them?

8 A About 25 years.

9 Q And that was from what years to what years?

10 A That I can't remember, the date.

11 Q Approximately.

12 A Well, I got out of there in about '75, I believe it  
13 was. Well, 25 years from that.

14 Q So from approximately 1950 to approximately 1975?

15 A Somewhere around there.

16 Q And did you work there full time during that period of  
17 time?

18 A No. I worked there whenever I could or whenever I  
19 felt like it or -- it wasn't that I -- like the job I  
20 got now, I gotta be there and if I don't go in that's  
21 it. But at the time I was working -- sometimes I'd  
22 lose two, three days a week. I wouldn't work the full  
23 week.

24 Q And was that consistent over that 25-year period that

1           you would work some weeks five days a week, some days  
2           four, some days three?

3       A     Some days six. Who knows. Whatever.

4       Q     In that 25-year period were there any gaps of more  
5           than two or three days between the times you worked?

6       A     Well, if I went on vacation or something there'd be,  
7           or if I was sick I'd be out; and I don't remember none  
8           of the dates, no.

9       Q     And --

10      A     If there's any way you can check the records you can  
11           check them. It don't bother me.

12      Q     I'm just trying to get an idea from your own  
13           recollection. Other than vacations or illness,  
14           though, were there any other periods that you didn't  
15           work there for longer than a couple days?

16      A     Unless there was a storm and we didn't go in that  
17           would be it.

18      Q     If what?

19      A     If there was a snow storm we wouldn't make it.

20      Q     On the days you went in did you work full days? Did  
21           you work full days?

22      A     Sometimes half days. Sometimes full days.

23      Q     And what was the nature of your job at Whitney Barrel?

24      A     Washing and painting drums and driving a truck.



1 Q And would that have been a stake truck that you drove,  
2 a truck with high sides?

3 A Yes. Rack body. It was all closed in, the last one I  
4 had, but they had two or three trucks. They had all  
5 kinds of trucks, even trailers; but I never drove  
6 them.

7 Q You drove the high side?

8 A Straight job.

9 MR. FACHER: I think probably the witness  
10 ought to just describe what he did rather than you  
11 trying to identify it for him.

12 MR. GERONEMUS: Okay.

13 MR. FACHER: I don't know what a stake is  
14 and I've driven a few trucks in my life.

15 THE WITNESS: Before they used to have them  
16 that the sides were open and they'd have like stakes  
17 going up and drums. Now they have them all closed.

18 Q And when you drove were they the kind with the open  
19 sides and the stakes?

20 A Sometimes. They had two or three trucks. Whichever  
21 one you had to take you'd take.

22 Q And one of those had the stakes on the sides?

23 A Well, they had pieces going across. They weren't just  
24 stakes to come up and -- it was made to carry the

1 drums.

2 Q And during approximately what period was that when you  
3 drove the truck with stakes going up and the --

4 A I told you, all different times.

5 Q Throughout the time you worked there?

6 A It wasn't one day, one year you do this and the next  
7 year -- whatever he told you to do you'd do and that's  
8 the truck he told you to take.

9 Q And that truck was there throughout the time you  
10 worked?

11 A It wasn't there all the time, no.

12 Q Do you remember approximately when it was there  
13 and --

14 A No.

15 Q When you drove was your job to pick up and deliver  
16 barrels?

17 A That's right.

18 Q And do you remember who you picked up barrels from,  
19 what companies?

20 A I remember a few of them.

21 Q Go ahead.

22 A Catania Spania (phonetic) in Somerville.

23 Q Could you --

24 A I couldn't spell it. Catania Spania. It's an oil

1 company, salad oils and stuff like that. And the  
2 paint company in Chelsea there, Cabot Paint. We even  
3 had Baird McGuire.

4 MR. FACHER: In Cambridge?

5 THE WITNESS: Holbrook. The place they got  
6 fenced off now. At the time it wasn't fenced off. I  
7 didn't know what was going on or who --

8 Q Do you remember any other companies?

9 A Foster Grant in New Hampshire. And there was a  
10 leather shop up in Penacook. I don't remember --

11 MR. FACHER: New Hampshire?

12 THE WITNESS: Yes. I don't remember the  
13 name of that one.

14 A Then there was a bleachery in New Hampshire, too; but  
15 I don't remember the towns.

16 MR. FACHER: Where was the leather shop, did  
17 you say, Pembroke?

18 THE WITNESS: Pembroke. Something like  
19 that. Penacook. That's what it was. That's what it  
20 was, not Pembroke.

21 Q You've mentioned a salad oil company, a paint company,  
22 I think, a bleachery, a leather company. Were there  
23 any other types of businesses that you picked up  
24 barrels from?

1       A     There was Pappas in Boston here we picked up at, and  
2             California Oil; and we done business with Edison Light  
3             Company who has drums. They lost so many of them I  
4             don't even remember who they were now.

5       Q     I'm also interested in -- what I was trying to get at  
6             was the kind of business that the places that you  
7             picked up drums from were in. You mentioned that one  
8             was a salad oil company, one was a paint company?

9       A     Pappas was salad oil, too.

10      Q     And Edison Light Company, what is the --

11      A     They had transformer oil and stuff like that.

12      Q     And California -- you mentioned another oil company?

13      A     California Oil, yes. Those were salad oil drums.

14      Q     And the leather shop, what were you picking up from  
15             the leather shop?

16      A     Drums. Open ones, closed ones, all kinds.

17      Q     And do you recall what was in the drums?

18      A     No, I don't know.

19      Q     And Foster Grant?

20      A     We used to -- well, we'd pick up drums sometimes and  
21             then we'd bring them paper barrels. We used to bring  
22             up a load of paper barrels and pick up whatever lead  
23             ones they had. I don't remember what they had in  
24             there.

1 Q Baird McGuire, do you remember what business they were  
2 in?

3 A They used to make waxes and stuff. And speaking of  
4 waxes there was a place in Chelsea we used to do,  
5 Lamco Wax Company. We used to do business with them.

6 Q And do you remember what was in the barrels that you  
7 picked up from Lamco Wax Company?

8 A I don't remember.

9 Q And I think Cabot Paints was the --

10 A Yes.

11 Q I gather they were in the paint manufacture business?

12 A Right. We used to deliver and pick up in there.

13 Q And again, do you remember what --

14 A We would be selling them most of the time, but we  
15 would pick up sometimes.

16 Q And do you remember what was in the barrels?

17 A No.

18 Q You've mentioned that you picked up barrels that had  
19 contained salad oil and transformer oil at one time.  
20 Do you remember picking up barrels --

21 A Transformer oil was Edison.

22 Q Right. Do you remember what any of the other barrels  
23 that you picked up --

24 A No, the only things they used them for was kerosene

1 oil at Edison.

2 Q That was at Edison. When you picked up the drums were  
3 they always empty?

4 A They had to be empty. I wouldn't pick them up.

5 Q Did you have instructions not to pick them up?

6 A I just wouldn't pick them up myself. I couldn't pick  
7 them up. The truck was too high to do that.

8 Q Was there a small amount of residue left in the drums?

9 A There might have been some. I don't know. I don't  
10 know just how much there was.

11 Q Do you remember ever picking up any barrels that had  
12 any kinds of warning labels on them?

13 A Well, for fire and stuff like that they had the red  
14 label on them. That's all. I don't go reading the  
15 labels before I pick them up. They say take them and  
16 I put them on the truck and that's it. What they do  
17 with them --

18 Q Other than fire labels any other kind of labels?

19 A No.

20 Q Could you describe to me what you did with the barrels  
21 after you picked them up and loaded them on the truck?

22 A Well, most of the time I'd come in and it would be  
23 after hours and I'd just park the truck, or just ready  
24 to go home and I'd just leave it there and that would

1           be it. I would come in, we'd put them -- back into  
2           the platform and put them on it or they'd put it out  
3           in the yard. They had a yard up in Wilmington they  
4           used to put them at. If we had the time we'd unload  
5           it. If we didn't it would be the next day or somebody  
6           else would do it.

7           Q     So you'd unload the barrels?

8           A     I wasn't the only driver, you know what I mean? If  
9           somebody else had to get the truck for something the  
10          truck was gone when I got there or something and that  
11          would be it.

12          Q     On those occasions when there was time to unload the  
13          barrels do you recall what happened to the barrels  
14          after they were unloaded?

15          A     Well, if we didn't have room for them inside we'd pile  
16          them out in the yard, and then later on we'd put them  
17          in the building and then they'd process them or cut  
18          them open or whatever they had to do with them. If  
19          they could be washed they'd be washed. If they  
20          couldn't they'd cut them open and make them open heads  
21          and burn them. They used to send them down to a  
22          different company to burn them, though.

23          Q     Why were some barrels not able to be washed?

24          A     The paint. If there was paint in them or something

1           like that you can't wash out then they would send them  
2           down to Woburn Barrel and they'd burn them and line  
3           them and send them back like new drums.

4           Q     I see. They burned them to get rid of the materials  
5           in it?

6           A     Yes.

7           Q     When you cut the barrel did you cut the top off, is  
8           that what you're doing?

9           A     Yes.

10          Q     And what did they do with the tops?

11          A     Made a cover of them.

12          Q     So you'd --

13          A     It was like a can opener. You tip the drum upside  
14          down on its side and you'd cut it open, and then you  
15          take that top part off and it goes back on after you  
16          burn it. They role the edge and then you leave it  
17          all together. So that's what they do with them.

18          Q     So they hold -- the part that you cut off as well as  
19          the other part were -- as well as the main part of the  
20          barrel were all --

21          A     The only part you cut off is the top lip. The top  
22          cover would come off, then you'd role the drum itself  
23          and put the cover back on it and take it down to burn.

24          Q     Let me have have these marked as famous Exhibits 1 and



1           2. We'll mark the top cover Exhibit 1, the bottom  
2           Exhibit 2.

3                               (Plastic overlay marked Exhibit No. 1 for  
4                               identification and photograph marked Exhibit  
5                               No. 2 for identification.)

6           Q    I'm going to represent to you that this is a chart  
7                that represents Whitney's and Aberjona and Murphy's  
8                Oil, John J. Riley Tannery and the property behind the  
9                Whitney Barrel Company that we've been calling the 15  
10              acres, I think; and I think I need a marker for this.

11           A    Well, Whitney had 14 acres, I believe. At least  
12                that's --

13           Q    I didn't hear you.

14           A    I said Whitney had 14 acres, I believe. I don't know.  
15                That's what they told me.

16           Q    And do you know where that was located?

17           A    Well, it's where the barrel company was right there.  
18                Then they had another 14 acres of land up in  
19                Wilmington that they had sold now.

20           Q    Could you show me approximately where the barrels  
21                would go when they were unloaded?

22           A    Well, if the building is here --

23           Q    Why don't you draw in the building approximately.

24           A    The building is here (drawing) and they'd put them  
                from this side all the way down in the back, and

1 sometimes they could be on that side over there. Most  
2 of the time they'd be in here so you could put them on  
3 the platform here. Then they would go in here to be  
4 processed.

5 Q Why don't you mark a P for where the platform would  
6 be.

7 (Witness complies.)

8 A Then the washroom would be back there.

9 Q Why don't you put a W where the washroom is.

10 (Witness complies.)

11 A They had another tank here. They'd first rinse them  
12 in here, then they'd wash them. Then they go down  
13 here with the painting and then they'd go out to  
14 another big platform. There was a platform here.  
15 That's where the truck used to back in and load them.

16 Q That would be the paint room?

17 A The paint room would be here.

18 Q Why don't you just write paint there, PA there.

19 (Witness complies.)

20 Q And is this the platform or --

21 A Yes, that's the front platform.

22 Q So there were two unloading platforms?

23 A One in the back and one in the front.

24 Q Put B where the barrels were stored.

1       A     They were on the platform here.

2       Q     And when the platform was too full?

3       A     It would be down in the back, being here (indicating).

4               MR. FACHER: Put a B here.

5               THE WITNESS: A "B" where?

6               MR. FACHER: Where they were in the back and  
7     on the side of the road there or the side near the  
8     road. The B is where the barrels were?

9               THE WITNESS: Yes, they were all like this  
10   (indicating).

11    Q     Did you ever work in cleaning the barrels or washing  
12    the barrels?

13    A     Yes.

14    Q     And could you describe to me how you clean a barrel?

15    A     We'd open them up in the back here, push them on the  
16    roller all the way into the washroom, and on this side  
17    here they had one to clean the inside. Then they  
18    would clean them over again in this other tank on the  
19    left.

20    Q     Yes.

21    A     And they'd turn in the hot solution and then they'd  
22    take them out and rinse them off, and then they'd  
23    steam dry them. That would be done over on this side  
24    here.

1 MR. FACHER: Sounds like doing the dishes.

2 A Yes, then they'd go out the escalator right out to  
3 the --

4 (Brief recess taken.)

5 Q Did you use any kind of brushes in washing out the  
6 barrels?

7 A Yes, we used hand brushes.

8 Q Any long-handled brush? Any brush with handles on  
9 them?

10 A Just so long (indicating).

11 Q Approximately how long?

12 A So you don't have to put your hand in hot water. Just  
13 long enough so you don't have to put your hand in hot  
14 water.

15 Q So about a foot or two foot long, is that it?

16 A Might have been that long (indicating).

17 MR. FACHER: About two, two and a half feet?

18 THE WITNESS: Yes, some of them. Some were  
19 shorter.

20 MR. FACHER: To reach in the barrel, is that  
21 the idea?

22 THE WITNESS: No, that was to take the paint  
23 off the outside and go over it with the solution and  
24 the water.

1 Q Do you recall what kinds of materials you used to  
2 clean the barrels, what the solutions were composed  
3 of?

4 A What they called them was caustic and dry sodium.  
5 That's all I know. Caustic and dry sodium, whatever  
6 it is.

7 MR. GERONEMUS: Why don't we have this  
8 marked as Exhibit 3.

9 (Sheet of terms marked Exhibit No. 3 for  
10 identification.)

11 Q Could you look at the famous list of chemicals and see  
12 if you recognize any of those names as chemicals you  
13 might have used?

14 A I never used them, no, not that I know of, not to my  
15 knowledge. If any of those were -- whether any of  
16 those were the drums that we did -- some I don't  
17 recognize. Some, the Malathion I recognize.

18 Q And from where do you recognize that?

19 A Baird.

20 Q You cleaned drums for Baird that contained Malathion?

21 A Yes.

22 Q Are there any other names that you recognize?

23 A Not from any customers that I know of.

24 Q Do you recognize the names from somewhere else?

1       A     I maybe seen a drum someplace. I don't know.

2       Q     But not from working with them?

3       A     They've got nothing to do with this place. I'm just  
4             saying, nothing's familiar here but Malathion. May be  
5             DDT, what do I know. I never used none of this stuff,  
6             no.

7       Q     Do you remember approximately when you cleaned the  
8             Malathion drums for Baird?

9       A     Before we changed the tank. Before we changed the  
10            tank to, you know, put the clean stuff in it you'd do  
11            them and send them back to Baird.

12      Q     Do you remember approximately what year that would  
13            have been?

14      A     Oh, Geez, that was all during the Vietnam War, I  
15            guess. I don't know. I really don't know the dates.

16      Q     I gather there was a lot of liquid that you used in  
17            cleaning the drums?

18      A     Water.

19      Q     Water, and you said caustic, I think?

20      A     Well, that's the solution you put in to do the job.

21                   MR. FACHER: Caustic and dry sodium.

22                   MR. GERONEMUS: Thank you.

23      Q     And what did you do with that solution when you were  
24            finished with it?

1       A     Just open the tank and let it go down the sewer.

2       Q     There was a drain in the middle of the room?

3       A     Yes, and it all drained right in the sewer.

4       Q     Did that sewer ever back up?

5       A     I guess in 25 years that I'd been there it's backed up  
6             a couple times. The whole thing was backed up around  
7             there. The place got flooded a couple times that I  
8             know of, that I remember.

9       Q     What did you do with the wash water when the sewer got  
10            backed up?

11      A     We wouldn't -- you couldn't wash. What are you going  
12            to do, stand in the middle of a river and wash drums?  
13            The thing backed up, it backed up. It ain't gonna go  
14            out of the building, it ain't gonna go no place.

15      Q     Do you know what caused the sewer to back up?

16      A     Main line was blocked up somewhere someplace, I don't  
17            know.

18      Q     Now, once the barrels were reconditioned where were  
19            they stored?

20      A     Out in the front platform.

21      Q     The front platform.

22      A     If they didn't go on the truck they went on the  
23            platform and most of the time they had to go right on  
24            the truck and go out.

1       Q     Was the back yard ever too crowded to store anymore  
2             barrels in it?

3       A     Well, like I say, if -- he bought drums from other  
4             barrel outfits and they used to put them up in North  
5             Woburn. They'd put them in our yard. Wherever we had  
6             the room they put them.

7       Q     Did you ever have to store the barrels further north  
8             than the ordinary storage area?

9       A     You don't store them down there, no.

10      Q     Uh-huh.

11      A     You just store them right there in the yard where you  
12             can get at them.

13      Q     When you worked in the washroom do you ever remember  
14             any of the barrels containing residue of any kind, any  
15             liquid of any kind?

16      A     Unless it was rust and stuff.

17      Q     Anything other than rust in the barrels?

18      A     Well, that's what I say, the ones that had anything in  
19             them would be cut open for open headers. See, once  
20             they had something in them like that that wouldn't  
21             come out they'd put them in a different place. They'd  
22             cut them open and burn them.

23      Q     If they had any kind of liquid at all in them?

24      A     Not liquid. You're talking about residue. Now you're



1           talking about liquid.

2       Q     Sorry if I misled you.

3       A     That's what I think you're trying to do.

4       Q     No, I'm not. Mr. Facher would never let me anyway.

5       A     I'm telling what I did for 25 years. I got out of  
6           there as much as I could. I didn't work because I got  
7           a hundred percent disability from the government and I  
8           don't work everyday if I can help it.

9       Q     Let me rephrase it so it's clear, and believe me, I'm  
10          not trying to mislead you. I'm trying to find out  
11          what happened and what you know.

12                   Were there ever any barrels when you  
13          worked in the washroom that contained any liquid?

14       A     If there was there wouldn't be that much in them. And  
15          then we'd have to pick them up about 3 foot off the  
16          ground. We'd put them on top of another tank upside  
17          down. So if they was half full you couldn't pick that  
18          drum up.

19       Q     Were there times when they had small quantities of  
20          liquid in them?

21       A     They might have. I don't know.

22       Q     And what would you do with that?

23       A     I didn't check them.

24                   They'd put them in the pump and wash them in

1 with the solution.

2 Q And that would --

3 A That would go in turn down the drain.

4 Q And when I use the word residue I mean something left  
5 in the barrel. You took it to mean something like  
6 residue --

7 A Well, residue I think you mean something like this  
8 chair in the barrel that won't come out. If you open  
9 it you can get the liquid out but not residue out.

10 Q So residue would be some kind of solid?

11 A If it's solid it's solid. It ain't gonna wash that  
12 drum.

13 Q Did you ever hear of a company called the Kingston  
14 Steel Barrel Company?

15 A Yes.

16 Q And in what context did you hear about them?

17 A We used to buy drums from them, sell them drums,  
18 burners.

19 Q And were they in the same business as Whitney?

20 A Right, yes.

21 Q And do you know why you bought and sold drums from  
22 them?

23 A Well, when we needed drums we'd get them from him.  
24 You can't just go out and pick them off trees so you

1           buy them from whichever company has them and vice  
2           versa. They want one kind and you want another.

3           Q     Do you recall a fellow at the Kingston Steel Barrel  
4           Company named Roy Boudreau?

5           A     Yes.

6           Q     And who was Mr. Boudreau?

7           A     Well, he was managing the place.

8           Q     And did you ever meet Mr. Boudreau?

9           A     Yes.

10          Q     And where did you meet him?

11          A     I knew him from Malden, when he was in Malden Barrel  
12          Company.

13          Q     Did you ever see or speak to him while he was at the  
14          Kingston Company?

15          A     Yes.

16          Q     For what reason?

17          A     To get the drums I wanted, and whatever drums he  
18          wanted I'd bring to him.

19          Q     This would involve picking up and delivering?

20          A     Yes, picking up and delivering.

21          Q     Do you recall approximately when you had dealings with  
22          Kingston Barrel?

23          A     I never thought it would come to this that I would  
24          have to remember dates when I brought barrels here and

1           there.

2       Q     Just if you remember.

3       A     I want to see this thing cleared up because I don't  
4           want to be bothered no more.

5       Q     I can appreciate that. Do you ever remember a fellow  
6           named Wayne Poole at the Kingston Barrel Company?

7       A     Who?

8       Q     Wayne Poole.

9       A     Where was he?

10      Q     At the Kingston Company.

11      A     I don't think so. I don't know. I maybe knew him if  
12           I seen him but I don't know his name.

13      Q     Were there ever occasions on which you would sell  
14           drums to Kingston for it to recondition?

15      A     No. We'd swap them drums. Like if they wanted open  
16           ones we'd give them the open ones and vice versa.

17      Q     And would those drums have already been cleaned when  
18           you'd swap them?

19      A     Yes.

20      Q     Did you ever sell them drums that were not cleaned or  
21           give them drums that were not cleaned and have them  
22           return them to you when they were cleaned?

23      A     No. They were mostly burning them up there.

24      Q     Do you recall any incidents in which anyone from the

1 Kingston Company emptied the contents of any barrels  
2 into the sewer?

3 A Okay. Now, that's what we're getting to now. That's  
4 only hearsay and what was in the paper that I know  
5 about that. I wasn't working there, I don't believe  
6 at the time.

7 Q I see.

8 A But they went to court over that and they both got  
9 fined for it, whoever it was, and it was in the papers  
10 and now they can't find out -- there's no record of it  
11 so -- I know you've checked it out so I don't have  
12 to --

13 Q Well, I'm only asking for your knowledge. If your  
14 knowledge is just --

15 A I only can tell you what I know. What I don't know,  
16 that's it.

17 MR. FACHER: In this case it's only what you  
18 read in the papers.

19 THE WITNESS: You can get just as much  
20 information out of me as you can in the paper.

21 Q Do you recall having any conversations with anyone who  
22 was employed at Whitney Barrel about the Kingston --  
23 the incident we've been describing about dumping into  
24 the sewer?

1           A     I don't remember who even told me about it, and they  
2                   got caught at it so I don't know. And I just bought a  
3                   house in Woburn after all this pollution and stuff  
4                   right down the street from the place.

5                   MR. FACHER: From --

6                   THE WITNESS: 480 Washington Street, yes.  
7                   I raised six kids in Woburn.

8                   MR. FACHER: Where did you live before that?

9                   THE WITNESS: North Woburn. Always in North  
10                   Woburn and one year in Lowell and that was it, right  
11                   back to Woburn again.

12           Q     Were you aware of any occasions on which the barrels  
13                   that you were storing at Whitney's were leaking?

14           A     Leaking?

15           Q     Yes.

16           A     What do you mean by leaking? We get drums back  
17                   sometimes that leak, yes, but they cut them out and  
18                   have them for trash drums or -- what do you mean,  
19                   coming in with stuff and leaking all over the place?

20                   MR. FACHER: That's what he means.

21           Q     That's what I mean.

22           A     No.

23           Q     Do you recall any other incidents other than the one  
24                   that you read about in the paper involving any legal

1           actions against Whitney Barrel?

2           A     Not legal action, no.

3           Q     Any actions by any regulatory agencies?

4           A     No.

5           Q     Do you recall any inspections of Whitney's property by  
6                 any local authorities?

7           A     The only one I know is the Board of Health come down  
8                 and told them to get the drums off of down at the end  
9                 and we did that. I went down and helped them to do  
10                that, the ones we could pick up. They had to be done  
11                with a dump truck. They couldn't have been put on the  
12                truck and then wheeled off.

13          Q     And where was that approximately where the drums were?

14          A     Down the end there.

15          Q     Do you want to mark on the map where?

16          A     I don't even know where this is now.

17          Q     This brown line I think is, to help you, is the access  
18                 road.

19          A     Yes, I know that. What's this piece of property here?

20                         MR. FACHER: That's the marshland. The  
21                         river's over there in blue. That whole white area is  
22                         the undeveloped, you know, wooded area behind the  
23                         plant.

24                         THE WITNESS: What's this?

1                   MR. FACHER: Those might be little trails.  
2                   I'm not positive of that.

3                   MR. GERONEMUS: That's what it is.

4                   MR. FACHER: In the woods.

5           A       We had to go down here someplace. To look at this  
6                   thing here it don't look wide enough to put a barrel  
7                   on it so I don't know.

8           Q       Was it somewhere down the access road?

9           A       Down the access road we had to go pick up the drums.  
10                   Now, who put them there I couldn't tell you.

11          Q       And approximately when was that?

12          A       Oh, Geez, I can't remember.

13          Q       That's okay.

14                   Do you remember whether there was any  
15                   article in the newspaper about that at the time or --  
16          A       I don't remember if there was or not on that. But I  
17                   know we went down and we were supposed to clean it up,  
18                   and there was some they couldn't pick up and that's  
19                   why they stayed there.

20          Q       About how many drums were there?

21          A       I don't know. I didn't count them. We just took out  
22                   what we could and that was that.

23          Q       And were they near this --

24          A       I don't even know what they did with them after they



1           took them. After he took them I don't even know what  
2           they did with them.

3           Q     And I didn't quite get your answer about how many  
4           drums there were.

5           A     I told you I didn't know.

6                         MR. FACHER: He didn't know. He said he  
7           took what he could.

8           A     What we could pick up we picked up.

9           Q     So there were some drums you couldn't pick up?

10          A     I believe, yes.

11          Q     And were they too heavy or --

12          A     Too heavy to pick up.

13          Q     And were they near this access road that's indicated  
14          by the brown line?

15          A     Yes.

16          Q     And was it at a point where the access road was near  
17          the railroad tracks? Do you recall that?

18          A     Well, it wasn't too far away from it, no.

19          Q     And from the back of Whitney's property --

20          A     There's a bridge down on -- down at that end -- it's  
21          not on that map.

22                         MR. FACHER: That's further north.

23                         THE WITNESS: It ain't. There's two of  
24          them. There's Olympia Avenue.

1 MR. FACHER: That's what I thought you  
2 meant.

3 Q Was it near the bridge?

4 MR. FACHER: I think --

5 A There's a roll bridge that goes over and that's why I  
6 don't even know.

7 MR. FACHER: Is Olympia Avenue on this  
8 chart?

9 THE WITNESS: No, they haven't got nothing  
10 on there. They have the -- they don't even know where  
11 to put the wells.

12 A Can I look at that map?

13 Q Yes.

14 (Witness looks at map)

15 A What's this supposed to be here, a swamp?

16 Q I think that's the swamp.

17 MR. FACHER: Here you've got our Salem  
18 Street. This is Salem Street.

19 THE WITNESS: That's Salem Street and that's  
20 Whitney Barrel.

21 MR. FACHER: That's Aberjona.

22 MR. GERONEMUS: Murphy?

23 A These are all tanks in here. They're mostly tanks.

24 MR. FACHER: You're talking about the

1 Whitney property?

2 THE WITNESS: Whitney's property now.

3 Trucks and drums are on this side. They got these  
4 trailers all lined up in there now with drums in them.  
5 That's what they had at that time. They ain't even  
6 got the -- I don't even see the bridge there either.

7 MR. FACHER: He doesn't see the bridge on  
8 the photograph which is the colored photograph.

9 A That used to go down the trucking outfit, right.  
10 That's where it stops at the bridge.

11 Q And were these barrels near the bridge that you're  
12 talking about?

13 A It would be before the bridge. Yes.

14 Q Well, if you don't see it on this map perhaps we can  
15 find another map a little later and see if we can find  
16 it.

17 MR. FACHER: Were they on Olympia Avenue or  
18 were they up farther?

19 THE WITNESS: No, on Whitney side. You  
20 couldn't get a truck down there anyway.

21 MR. FACHER: Do you remember those two  
22 concrete poles or abutments that are in the ground as  
23 you go up the property? Did you ever see those?

24 THE WITNESS: Near --

1                   MR. FACHER: Right by the Lechmere  
2                   warehouse. Is it that far up or less far?

3                   THE WITNESS: Lechmere is across the track.

4           Q     And do you recall who told you to take the drums out  
5                   of the --

6           A     The Board of Health come down and my boss says to get  
7                   them out of there. That's all I know.

8           Q     And who was your boss at the time?

9           A     Jack Whitney.

10          Q     Senior or junior?

11          A     Senior. He's dead now.

12          Q     And do you know who came down from the Board of  
13                   Health?

14          A     He's dead, too, App. App was his name.

15          Q     Is that E.M. App?

16          A     A-p-p. Eddie, yes, he worked for the Board of Health.

17          Q     I think there was also a Joe App?

18          A     No, Joe was his older brother. Yes. I know the whole  
19                   family.

20          Q     Do you know Mr. Riley, John Riley?

21          A     I know him but I don't think he'd remember me.

22          Q     Do you know whether he was told about the presence of  
23                   the barrels?

24          A     Whether he was told about them, I don't know.

1                   He never told me what was going on down  
2                   there. If anything was going on down there it was  
3                   always their doings, I don't know.

4           Q     Did anybody ever tell you whose property the barrels  
5                   were on?

6           A     No.

7           Q     Did you have any knowledge of what those barrels  
8                   contained?

9           A     No.

10          Q     Did anybody tell you to be careful with the barrels in  
11                   any way?

12          A     No.

13          Q     Did anybody tell you they might be hazardous?

14          A     No, they just told us, "pick them up" and that was it.

15          Q     Were you aware of any other inspections by any other  
16                   state or local agencies?

17          A     Like I say, if anybody went up to talk to him he'd be  
18                   up the front office. We wouldn't even know what was  
19                   going on. I never seen no one going through the  
20                   building.

21          Q     And I gather your answer would be the same for state  
22                   or federal?

23          A     I don't -- I never seen anybody that I know, no.

24          Q     When you worked at Whitney's did they ever store large

1           underground or large gas tanks?

2       A     That's what I just showed you in this picture, gas  
3           tanks. They stored them around the building mostly on  
4           this side here and down the back.

5       Q     That would be on the east side of the building?

6       A     Towards Murphy's.

7                   MS. FAWCETT: West side.

8                   MR. FACHER: That's the west side.

9                   THE WITNESS: Yes, the west side.

10      Q     And did they ever store them, the underground tanks,  
11           to the north of the Whitney buildings?

12      A     If I ain't mistaken they had some up on that dirt  
13           road.

14      Q     And could you mark on that about where?

15      A     Right about in back of this one here, around that, to  
16           the right of the road.

17      Q     Want to just mark with a T where those tanks were?

18      A     I don't know what all these things are here. That's  
19           why I don't know (indicating). But they'd have them  
20           all -- where there was open field they'd put the tanks  
21           in there.

22      Q     Did they ever bulldoze an area to do that?

23      A     No, not that I know of.

24      Q     Could you locate it better on -- why don't you put a T

1 on that.

2 (Witness complies)

3 Q Could you locate the tanks on this?

4 A Over in there (indicating).

5 MR. GERONEMUS: Why don't we have this and  
6 the underlying picture marked as an exhibit, as two  
7 exhibits.

8 Q If you'll just mark with a T on there where that would  
9 have been.

10 (Witness complies)

11 Q And do you know about how many gallons these tanks --

12 A They were all different sizes. I don't know.  
13 Couldn't tell you. You look at one and it might be a  
14 2000 and you'd think it was a 5. I don't know.

15 MR. GERONEMUS: Mark those as exhibits.

16  
17 (Acetate overlay to photograph marked  
18 Exhibit No. 4 for identification and  
19 Photograph marked Exhibit No. 5 for  
20 identification.)

21 MR. GERONEMUS: Let the record reflect that  
22 we've marked as Exhibit 4 the acetate overlay for  
23 Exhibit 3 (sic) which is a color aerial photograph  
24 taken in April, 1974.

MR. FACHER: Not identified by the witness  
as 1974.

1                   MR. GERONEMUS: Which I am representing was  
2                   taken in 1974.

3                   THE WITNESS: I just looked at that to see if  
4                   that house was there or the garage. That's what I was  
5                   worrying about, if they took pictures afterwards. I'm  
6                   trying to --

7           Q     And approximately how many of these storage tanks were  
8                   in the area marked with a T?

9           A     I don't know. As many as he could get in there.  
10                   Sometimes if he didn't have the room for them that's  
11                   where they went.

12          Q     Would you say more than ten?

13          A     Yes.

14          Q     More than 20?

15                   MR. FACHER: One at a time or over the  
16                   years?

17                   MR. GERONEMUS: I'm sorry I should be more  
18                   clear.

19          Q     At any one time would you say there were ever more  
20                   than ten?

21          A     I really don't know.

22          Q     And do you have any idea whether those tanks contained  
23                   any liquid of any kind?

24          A     No, because you couldn't pick them up and move them.



1           They would store them down there, then they would take  
2           them up to the factory and steam them, if they had a  
3           hole in them or clean them out or whatever they'd do  
4           to them, paint them, that's what they had to do;  
5           scrape the outsides and paint them. That's what they  
6           did with them.

7           Q     And did you ever take any of the storage tanks up to  
8           that area or not?

9           A     No, I never did. They come in on trailer trucks and  
10          trailers and so forth but I never --

11          Q     Did you ever see anybody drive up the access road with  
12          the tanks on the truck?

13          A     No, but I know they were there, that's all.

14          Q     Do you know whether Mr. Whitney permitted the trucks  
15          to drive up that road?

16                   MR. FACHER: Well, that's not a fair  
17          question.

18          A     That ain't got nothing to do with me. I don't know.  
19          Like I told you, if he could squash that court record  
20          in Boston and Woburn -- you're asking me foolish  
21          questions now. That's getting foolish.

22          Q     I'll try to ask better questions.

23          A     Gee, I don't know.

24          Q     I'll try to ask better questions.

1       A     You're trying to put words in my mouth. That's what  
2             you're trying to do.

3       Q     I apologize if it seems that way. I really am not  
4             trying to do that. I apologize.

5                     Were you ever aware of any involvement  
6             between Whitney Barrel and the local police  
7             department?

8       A     No.

9       Q     Do you know whether Mr. Riley was aware of the trucks  
10            driving up that access road?

11                   MR. FACHER: I object to that. That's also  
12            not a fair question.

13       A     He didn't know they were going up there. How's he  
14            supposed to look from where his office in his building  
15            is to where the road was.

16                   MR. GERONEMUS: For all I know, Mr. Facher,  
17            he was down visiting Mr. Whitney.

18                   MR. FACHER: That might be for all you know  
19            but you're asking the witness to --

20                   MR. GERONEMUS: I'm asking to his knowledge.

21                   MR. FACHER: No, you're not. You're saying:  
22            Do you know if Riley was aware.

23                   MR. GERONEMUS: I'll rephrase it.

24       Q     To your knowledge was Mr. Riley --

1       A     I don't even know what Whitney was doing never mind  
2             Riley.

3       Q     Did you ever see any vehicles of any kind drive up the  
4             access road that we've been talking about?

5       A     No.

6       Q     Did you ever see anyone on that property, on that  
7             access road to the north of the Whitney Company?

8       A     Well, sometimes right at the end of Riley's land they  
9             had steel gurders and stuff and we'd have to go up  
10            there and get them out of there, take them out. Or  
11            there'd be city workers checking the sewer or  
12            something, but that ain't got nothing to do with me.

13      Q     Could you mark for me about where the steel gurders  
14             were, just approximately?

15      A     What do you have two pictures here or one?

16      Q     We have an acetate overlay.

17                   MR. WELCH: I think this list was marked as  
18             Exhibit 3.

19                   (Discussion off the record)

20      A     What are these here, Murphy's tanks down there?

21      Q     I couldn't tell you.

22      A     Yes, must be.

23                   MR. FACHER: What's the question?

24      A     Well, here's where Whitney Steel was, right aside of

1 Riley's land.

2 Q Before we mark that, is that T still in the right  
3 place, where those barrels were since we've moved the  
4 overlay?

5 A What, right here?

6 Q The T that you marked as indicating where the tanks  
7 were, is that still in about the right place?

8 A I can't even find it.

9 Q Here's the T.

10 A Somewhere around in there, yes.

11 Q Why don't we clip this so we have that proper.

12 A It's over to the right of the road. That's right in  
13 the middle of the road.

14 Q So you want to move it down. Is that better?

15 A That's right. Well, too far, no. No, that's it right  
16 there, yes.

17 Q And could you mark --

18 A The steel was right along in here.

19 Q Why don't you mark an S where the steel was.

20 (Witness complies.)

21 A That there's Riley's land there, I believe.

22 Q And what did you use the steel for?

23 A He used to buy and sell it.

24 Q This was "he" being?

1       A     Jack Whitney. He was in the steel business, tanks,  
2             drums, junk, anything.

3       Q     Do you know of anybody else going up the access road  
4             for any other reasons?

5       A     I don't -- like I told you, when I get back there I  
6             get out and if I'm inside working I can't be watching  
7             the road.

8       Q     Were there ever occasions when you walked on the  
9             access road?

10      A     I'd just walk around in through here to the tracks  
11             (indicating) and then down.

12      Q     So --

13      A     Right through Riley's land. Right in here. I'd go in  
14             through here and down around.

15      Q     So you'd walk -- why don't you trace your approximate  
16             route on the map that you'd walk.

17      A     I'd walk this through here along the tracks and come  
18             down here (indicating).

19      Q     Could you just remark that S that's gotten a little  
20             blurred there where you've indicated the steel drums?

21      A     Oh, I just went over it.

22                     MR. FACHER: Not drums.

23                     MR. GERONEMUS: I'm sorry, steel gurdurs.

24      Q     And what was the purpose of these walks that you would

1 go on?

2 A Like at noon time if I had a few minutes I'd just take  
3 a walk out and go back in, get some fresh air or  
4 something. No reason for it, just to get out of the  
5 building.

6 Q And on those walks did you ever see any barrels or  
7 other debris?

8 A Well, I think there was some wood dumped in Riley's  
9 land. Some wood or something was dumped. That was it  
10 because I just circled around and come back.

11 Q Did you see any drums?

12 A I don't remember if there was any on Riley's land  
13 right there or not.

14 Q Other than the tanks and the steel that you've  
15 described did you ever see any other debris in the  
16 wood in the area north of Whitney's property?

17 A Well, like I had to go down and get the drums out of  
18 there and then there was -- he had a trailer down  
19 there with some chairs and stuff that got burned right  
20 down by that T in the back there someplace.

21 Q Where you've marked the T on the --

22 A Somewhere around in on that side there. But that's  
23 all. There was tanks in the trailer and the trailer  
24 got burned down there so I don't --

1 Q And do you recall any other debris on that property?

2 A There was some like air ducts and stuff.

3 Q And approximately where was that?

4 A Right in the same part right in here.

5 Q Where you marked the T?

6 A Yes, on the other side of the T maybe. I don't know.

7 Q And do you recall: Did you see that other debris when  
8 you were -- on the walks that you've described to get  
9 fresh air?

10 A I'd see whatever -- I don't know what's there now or  
11 what they put -- if they put anything else on there  
12 after I left. I don't know. It's been about 11 years  
13 now.

14 Q I was just trying to get --

15 A Yes, when I got up there. Might be there's more stuff  
16 there now than there was when I was there.

17 Q But did you see those when you went on your walks for  
18 fresh air?

19 A I seen them when I told you I seen them and then when  
20 I was sent there to pick up the drums. That was it.

21 Q Other than your walks for fresh air and the time you  
22 were sent up to collect the barrels that you've  
23 described were there any other occasions when you were  
24 on the property that's generalized north of the

1 Whitney Company?

2 A (No response).

3 Q Were you aware of any time --

4 MS. FAWCETT: I didn't hear your answer.

5 MR. FACHER: Did you say yes or no to that?

6 THE WITNESS: I forgot what the question  
7 was. Could I hear the question?

8 (Question repeated by Mr. Facher.)

9 A No. And for a year of that time I was living in  
10 Lowell so I didn't hang around Woburn to find out if  
11 anybody went up there.

12 Q Were you present when the truck that you described or  
13 trailer caught on fire?

14 A I don't even know who brought it there or how it got  
15 there but I know it was there and it was burned.  
16 That's all I know.

17 Q Were you ever aware of anybody depositing any  
18 materials of any kind on that property that was north  
19 of Whitney Barrel?

20 A No. I've gone up there and pulled tanks out of there.  
21 When he'd want a tank out of there we'd go and get it.  
22 Whoever was there would have to go and do whatever he  
23 tells you to do.

24 Q Were those the tanks that you described and marked T?



1       A     Yes, whatever was there. He'd mark it and we'd have  
2             to go and get it for him.

3       Q     Do you remember how many times you did that about?  
4             Your answer would be no?

5       A     No.

6       Q     Were you ever instructed to dispose of the contents of  
7             any barrel on the property to the north of Whitney?

8       A     No.

9       Q     Other than the complaint by the -- by Mr. App to Mr.  
10            Whitney were you aware of any complaints, any other  
11            complaints to Mr. Whitney, regarding storing of  
12            material, barrels anywhere?

13      A     He's the only one I seen. He's the only one that -- I  
14            know him, so if somebody else went in the building and  
15            I didn't know him I don't know what he's there for and  
16            they don't tell me what he's there for so --

17      Q     I'm just asking for what you know.

18      A     Yes, I know. Yes.

19      Q     Have you ever heard of a company called the Roy  
20            Brothers?

21      A     Yes.

22      Q     And what business were they in?

23      A     Trucking.

24      Q     Did you hear of them in connection with your work at

1 Whitney?

2 A Sometimes they'd carry stuff to the -- we done some  
3 moving for a bubble gum machine company and we crated  
4 the machines and they took them to the dock for us on  
5 the truck. That was it. I know they're in -- they've  
6 got tanks and they got all kinds of trailers.

7 Q Do you recall if they ever dumped any materials into  
8 the sewer behind Whitney's?

9 A I never seen them. I never seen them.

10 Q Did anyone associated with Whitney Barrel ever tell  
11 you that they had done so?

12 A I don't remember if they did or not. I don't remember  
13 -- I don't even remember hearing about it.

14 Q Did you ever see Mr. Riley go up the access road?

15 A No.

16 Q Or anywhere else on the property that's north of  
17 Whitney Barrel?

18 A I don't know, if he came down to talk to Jack one  
19 time. I don't know.

20 Q But you don't remember?

21 A I don't know what it was for or what. I don't know.  
22 He might have gone down and talked to him but I  
23 couldn't tell you.

24 Q Are you familiar with a company called the Stahl

1 Chemical Company?

2 A What?

3 Q The Stahl Chemical, S-t-a-h-l?

4 A From where?

5 MR. GERONEMUS: Do you know where they are?  
6 Peabody?

7 MR. FACHER: I don't know whether it's  
8 Peabody.

9 Q Your answer is no?

10 MR. FACHER: It's on the north shore  
11 somewhere.

12 A I never heard of it.

13 MR. FACHER: Maybe Peabody is right. I'm  
14 not sure.

15 THE WITNESS: Where?

16 MR. FACHER: Maybe Peabody, I'm not sure.

17 Q Did you ever hear of a company called Capital  
18 Equipment?

19 A Yes, that's Whitney Barrel.

20 Q What business was Capital Equipment in?

21 A Scrap salvage. That's what I'm telling, the tanks.  
22 He was in all the businesses.

23 Q Were you also working for Capital Equipment?

24 A You'd go in there and if they wanted you to do this

1           you go and do that. There was no set job you had. He  
2           wanted you on the tanks or going out and picking up  
3           rubbish, this is scrap steel I'm talking about, and  
4           that would be it.

5           Q     And did Mr. Whitney run both Capital Equipment and  
6           Whitney Barrel?

7           A     Right.

8           Q     But there was no separation between the work you did  
9           for Capital and the work you did for Whitney?

10          A     No, we got the same pay for the same job.

11          Q     And nobody said to you, "you're going to be working  
12          for Capital this morning"?

13          A     No, you didn't get one check for Capital and one from  
14          Whitney. It's all the same.

15          Q     All right. Did you clean those tanks in any way that  
16          you've --

17          A     Scrape them outside and paint them. And we've done  
18          that, too.

19          Q     And where would the scraping and painting occur?

20          A     Out in the yard.

21          Q     In Whitney's yard?

22          A     On the left side of the building, yes.

23          Q     And did you use any kind of liquid to clean them?

24          A     No, just muscle. Scrapers, muscle and paint with

1           rollers. That's all you'd use.

2           Q    Do you remember using something called TSP or  
3           trisodiumphosphate to clean barrels?

4           A    The only thing I told you is caustic and I'd get it  
5           from George Mann and that's it. Caustic and dry  
6           sodium. Now, what the right name is I don't know.  
7           That might be what it is, I don't know.

8           Q    And do you remember what kind of containers the  
9           caustic came in?

10          A    Fiber barrel, paper barrel or a tin barrel. A tin  
11          barrel, I believe it was.

12          Q    And when they were empty what did do you with them?

13          A    You'd just put them in the tank and wash them and  
14          paint them and ship them out.

15          Q    And --

16          A    They used them for tar, putting tar -- like Cabot used  
17          to buy them and they'd full them full of tar, roofing  
18          tar and stuff like that.

19          Q    And what did the dry sodium come in?

20          A    Bags, paper bags.

21          Q    Do you remember where that was bought?

22          A    George Mann, Stoneham. Paper bags. I don't know.  
23          Might have been fiber barrels. Could be either one  
24          because they're --

1 Q Do you remember there ever being a fire at Whitney's?

2 A Yes. That last fire I wasn't even working there.

3 Q Were there fires before the last fire?

4 A There was one inside but it wasn't that bad.

5 Q Do you know what caused that?

6 A No. Because you got a nice new building down there  
7 that they didn't have. When I worked there was block,  
8 cinder block.

9 Q Were you aware of any incident in which cars were --  
10 involving the burying of cars in the Aberjona river  
11 area?

12 A What?

13 Q Burying of cars.

14 A Burying cars in the Aberjona? No.

15 Q Were you aware of any dumping of waste by Murphy's  
16 Waste Oil into the sewer, into the manhole?

17 A That -- I don't know nothing about what he does.

18 Q Do you remember the names of any of the individuals  
19 who worked at Whitney Barrel Company when you worked  
20 there?

21 A That's what I was trying to think of. All this time  
22 I've been trying to think. There was a foreman named  
23 John DeLeo when I was first hired. He worked there I  
24 forget how many years.

1 Q Could you spell that?

2 A No.

3 Q John DeLeo?

4 A D-e-L-e-o? And there was a Bill Flaherty.

5 Q Do you know where he --

6 A He was from Somerville at the time. I don't know  
7 where he is now, whether he's living or not.

8 Q That's Mr. Flaherty?

9 A Yes.

10 Q Do you know where Mr. DeLeo was from?

11 A He was from Woburn. Where he is now I don't know.

12 Q Do you remember anyone else who you worked with?

13 A Yes, about three or four of them. They're all dead.  
14 They had some kids come in but they worked one day and  
15 they're gone the next. They get a couple of bucks and  
16 they take off.

17 Q Do you remember a fellow named Richard Sousa or John  
18 Sousa?

19 A Yes, Richard.

20 Q Or Tom Sousa?

21 A Richard and Tom, they both worked there driving a  
22 trailer, and Tom Clark who is dead. Bill Leidman is  
23 dead. They're almost all dead, the ones that I knew.  
24 Then they had some kids. I don't even know their

1 names.

2 Q Do you know where --

3 A Capallo was there. There was a Capallo, and --

4 Q Is that Joey Capallo? Is that --

5 A I think Joey worked -- yes, Joey. Someone was telling  
6 me his brother worked there but I don't -- unless he  
7 did after I did. I don't know.

8 Q What was his brother's name?

9 A They call him Pudgy. I don't know what his name is,  
10 what his right name is.

11 Q Do you remember where Richard Sousa lived when you  
12 knew him?

13 A He lived in Woburn at the time but he ain't in Woburn  
14 now.

15 Q Do you know where he is now?

16 A He's up in Burlington.

17 Q And how about Tom Sousa?

18 A He's in Stoneham.

19 Q Stoneham?

20 A Yes.

21 Q Is that Stoneham, Mass. or --

22 A Yes, Mass.

23 Q Did you know an individual named Ronny Knight?

24 A Yes, and I believe he's dead. Yes.



1 Q Did he work at --

2 A He worked at Whitney, yes.

3 Q And --

4 A I was thinking of him this morning but I heard he died  
5 and I don't know. He's from North Reading.

6 Q North Reading?

7 A Yes. He was anyway.

8 Q And --

9 A There's a Herb. I can't think of his last name. I  
10 don't know whether he's still working there or not.  
11 He worked for Aberjona Auto Parts before he came  
12 there. I can't think of his last name.

13 Q And what about Alan Brown, does that name ring a bell?

14 A Yes, he worked there but where he is God knows.

15 Q Do you know where he was the last time he worked  
16 there?

17 A Woburn. Someplace in Woburn but I don't know where he  
18 is now. I haven't seen him. I used to see him on the  
19 street.

20 Q Do you remember there being any kind of a bad smell at  
21 Whitney's?

22 A At Whitney's?

23 Q Yes.

24 A Malathion. That's about the only one that really --

1 Q What about when you walked on the property north of  
2 Whitney's?

3 A You got it all over East Woburn at different times.  
4 How can you tie it in to the road?

5 Q Were you ever aware of Mr. Riley telling Mr. Whitney  
6 about a -- talking to Mr. Whitney about a fence?

7 A Nope.

8 MR. GERONEMUS: Why don't we take a break  
9 for about five minutes. I want to look through my  
10 notes and see if we have a better map.

11 (Brief recess taken.)

12 Q I think I have one more question. When you  
13 reconditioned the barrels did you place any kind of  
14 markings on them?

15 A No. If we marked them we'd mark them with chalk,  
16 nothing that would come off, you know. I mean, chalk  
17 will wipe off but -- that's how we used to keep the  
18 different ones separate from who they belonged to.

19 Q And the time period when you saw the tanks and worked  
20 with the tanks, that was while, obviously, while you  
21 were working at the Whitney Company?

22 A Yes, in the 25-year period.

23 Q But you couldn't date it more --

24 A They may be gone. They may be back there tomorrow.

1 Q You couldn't date it more specifically?

2 A No.

3 MR. GERONEMUS: I have nothing further.

4

5 CROSS-EXAMINATION

6 BY MR. FACHER:

7 Q I won't be very long, sir. First I want you to tell  
8 the record when you were first contacted by any lawyer  
9 and how many times you were talked to and what you did  
10 or said about it.

11 A Well, I was contacted two or three times by a fellow,  
12 I don't even remember his name. I didn't bring his  
13 card in.

14 Q An investigator?

15 A Investigator, yes.

16 Q And what did he want to know and what did you tell  
17 him?

18 A The same questions he asked me.

19 Q You gave him the same kinds of answers?

20 A Same answers. I can't tell him nothing I don't know.

21 Q How many different times did he call you or did he  
22 come and see you?

23 A I think three or four times. He came once.

24 Q At work or your house?

1 A No, at my house.

2 Q Now --

3 A And then he called up.

4 Q How many different times did lawyers for the  
5 plaintiffs call you, if you remember, after the  
6 investigator?

7 A The plaintiff, which one would that be?

8 Q That's Mr. Geronemus.

9 A He called me what, two or three times.

10 Q And was he asking questions or just making  
11 arrangements for this deposition?

12 A Same thing and making arrangements for the deposition.

13 Q In substance did you tell these gentlemen what you've  
14 said here today?

15 A The same thing.

16 Q Same kinds of things?

17 A About the same thing, yes.

18 Q Did you indicate you couldn't add very much to the  
19 information?

20 A No.

21 Q Well, did you get out of the service in the fifties  
22 sometime? You're talking about World War II?

23 A '45.

24 Q You're talking about World War II?

1       A     Yes.

2       Q     And you lived in -- you presently have your -- you're  
3             at 480 Washington?

4       A     Right.

5       Q     How long have you been there, sir?

6       A     About 18 to 20 years.

7       Q     And before that?

8       A     I lived a year in Lowell and North Woburn after that,  
9             and I was born in North Woburn, and I think I spent --  
10            I went up to Wilmington another year. Yes, I had a  
11            house in Wilmington. I was gone out of Woburn about  
12            two years. Most of the time I was right back in  
13            Woburn.

14      Q     Do you have any family members or relatives that live  
15             in Woburn apart from --

16      A     My mother and father were always in Woburn. I got a  
17             brother that still lives in Woburn and we got five  
18             kids but they're gone to Stoneham, and there's only  
19             one in Woburn out of the five. There's two living  
20             with me.

21      Q     Now, you were shown this exhibit with this long list  
22             of chemicals on it and I think you said the only one  
23             you recognized was Malathion?

24      A     Yes.

- 1 Q Was that picked up from any customer, do you remember?
- 2 A Yes, Baird McGuire.
- 3 Q And the rest of these names on here you don't
- 4 recognize?
- 5 A I don't know if we had them, but there's some that I
- 6 never even seen but --
- 7 Q Did you ever see any labels on barrels bearing any of
- 8 those names?
- 9 A I don't remember.
- 10 Q You said that --
- 11 A I don't remember.
- 12 Q Did you see any papers labels --
- 13 A I don't go reading them.
- 14 Q Were there any labels --
- 15 A Danger labels. No, I never seen none.
- 16 Q Any labels affixed, paper labels stuck on these
- 17 barrels that you were picking up?
- 18 A Most of the barrels got something stuck on them but I
- 19 don't remember what they were.
- 20 Q Did you see anything that even looks like these
- 21 chemical names on Exhibit 3?
- 22 A No. I don't remember.
- 23 Q You marked -- you said something about fire. That
- 24 would be something that might have said inflammable or

1 something like that? Would any markings like that  
2 have been -- did you see any markings like that that  
3 may have said flammable?

4 A Well, they were on the barrels, some of them, yes.

5 Q Some of them?

6 A But what they were I don't know. I don't remember.

7 Q Now, you were picking up basically empty barrels that  
8 already had been used by whatever customer?

9 A Right, used barrels.

10 Q And did you personally ever unload or put any barrels  
11 on anybody else's property other than on Whitney's  
12 property?

13 A Not that I know of.

14 Q You said you'd pile them in the yard and --

15 A Yes, put them in there or on the platform and back the  
16 truck in and they'd go right inside.

17 Q And in your observations or the time you were at  
18 Whitney did you ever see any barrels that were leaking  
19 chemicals onto the ground?

20 A I never seen them.

21 Q And did you ever smell anything that smelled to you  
22 like some kind of a chemical?

23 A Malathion is the only one that really stinks that I  
24 know of.

1 Q Did you ever smell anything on anybody else's property  
2 that smelled like paint stripper or nail polish  
3 remover, that kind of a smell?

4 A No. They might have had some in there but I don't  
5 remember.

6 Q You didn't smell it?

7 A They had --

8 Q Where are you talking about?

9 A No, I'm saying I don't remember what they had but they  
10 had --

11 Q At Whitney?

12 A They had some alcohol drums and stuff like that.

13 Q In Whitney?

14 A Yes.

15 Q I'm talking about on this property in white on the  
16 chart.

17 A In the yard?

18 Q In the property above the yard.

19 A No.

20 Q In white, did you ever --

21 A No.

22 Q -- see any chemicals leaking or smell anything --

23 A No.

24 Q -- that smelled like a chemical?



1 A No.

2 Q On that property did you ever see any barrels or drums  
3 that bore labels with these names on them of Exhibit  
4 3?

5 A No. Like I say, they might have been put there after  
6 I worked down there. I don't know.

7 Q No, we're talking about the time you were there during  
8 your employment. That's all I'm asking about.

9 A I don't remember seeing those on any barrels.

10 Q Did you start to work at Whitney after you got out of  
11 the service?

12 A Way after.

13 Q Way after. Would it be what, mid --

14 A Well, I got out in '45.

15 Q Be about '55 then?

16 A Somewhere around '50 or -- well, in '75 I was there  
17 about 25 years.

18 Q So it would be about '50?

19 A Yes.

20 Q And you did both driving, picking up barrels and  
21 working in the plant?

22 A Yes, washing and painting drums.

23 Q So you were a "jack of all trades," so-to-speak?

24 A Well, they tell you to do it you do it.

1 Q Now, what did Whitney have in North Woburn?

2 A Just property.

3 Q Just empty property?

4 A Yes.

5 Q And they kept barrels up there?

6 A Yes, sir. That place was covered with barrels.

7 Q And did you deliver barrels up there, too?

8 A Sometimes. That's where I broke my ankle. I went up  
9 there to pick something up and after I broke my ankle  
10 and I wasn't back working no more.

11 Q So Whitney had an auxiliary storage area up there?

12 A Yes.

13 Q Now, you said you saw, if you look at the picture, you  
14 said you saw barrels at some point -- strike that --  
15 did you see barrels at some point that were not on the  
16 Whitney property?

17 A Well, like I went up and got them up there when we  
18 were told to take them off.

19 Q On that occasion, okay. That was the only time?

20 A Yes.

21 Q Did you put those barrels up there?

22 A No.

23 Q And you don't know how they got there?

24 A No.

1 Q And you don't know how long --

2 A I guess if Whitney sent us up there he must have knew  
3 about it.

4 Q But you didn't know about it?

5 A No.

6 Q Now, the tanks that you described, did you put those  
7 on the property?

8 A No.

9 Q Now, those were there awaiting to be cleaned and  
10 reconditioned?

11 A Be scraped and painted, yes.

12 Q So would it be fair to say they'd be there a short  
13 period of time and then somebody would come out and  
14 get them and return them?

15 A Yes.

16 Q These tanks in other words belonged to customers?

17 A No, they belonged to Whitney.

18 Q So Whitney bought them and then he was going to resell  
19 them?

20 A Yes.

21 Q And do you have any idea when it was that you saw  
22 those tanks?

23 A All different times.

24 Q They would be -- were they being cleaned in the same

1 way you described or is there a different way of  
2 cleaning bigger tanks?

3 A They took them out to the right side -- west side of  
4 the building and scrape them and paint them, and they  
5 were sold for secondhand steel drums -- steel tanks,  
6 rather.

7 Q Now, you said you saw some wood on Riley's land?

8 A I believe that's where it was. Unless Riley don't own  
9 the land. I don't know.

10 Q And did you see any barrels that contained any kind of  
11 liquid on Riley's land?

12 A The only thing I seen on Riley's land was the steel in  
13 the front of his land. I don't even know if it was on  
14 the road or the property and chain link fence right at  
15 the -- where the well is, the road that goes into the  
16 well.

17 Q And that's true for the whole time that you worked  
18 there?

19 A Yes. He must have dumped afterwards, I don't know.

20 Q After you left, right. So you don't know what  
21 happened after you left?

22 A No. I've been out of there over -- it's going on 11  
23 years or so now so --

24 Q But in the 50s and 60s is when you were making these

1 observations?

2 A Well, between the time I was there. But like I told  
3 him, I don't remember the dates. It could have been  
4 just before I left there for all I know.

5 Q And did you -- how far away is Murphy from --

6 A He borders Whitney's land.

7 Q Were you able to observe operations on Murphy's  
8 property?

9 A I'd just see a truck in there once in a while putting  
10 the oil in the tanks down the back.

11 Q When you were driving a truck did you bring in trucks  
12 carrying barrels on Sundays?

13 A Sundays?

14 Q Yes.

15 A No.

16 Q Or weekends?

17 A No. Like I'd go up to New Hampshire on a Saturday  
18 maybe and pick up a load and bring it back and just  
19 leave it in the yard, yes. I never worked on Sundays.

20 Q Just leave the truck in the yard?

21 A The truck loaded and everything. Just get in my car  
22 and --

23 Q You wouldn't unload it afterward?

24 A No, go home.

1 Q Now, if you look at that photograph behind Murphy's  
2 Waste Oil and along Salem Street there appear to be  
3 houses.

4 A Right here. That's right on Salem Street.

5 Q Right on Salem Street?

6 A Yes.

7 Q Those houses, are -- people in those houses, are they  
8 able to observe operations in Murphy's?

9 A No.

10 Q Or Whitney's?

11 A Well, one is related to Murphy. He can look out his  
12 back window and see Murphy's tanks and stuff.

13 Q But as far as Whitney's operations?

14 A He can't see nothing of Whitney's.

15 THE WITNESS: See, these are the houses  
16 there. That's his in-laws there. There's a big  
17 garage here now. But these other houses I don't even  
18 know who lived there.

19 Q Did you ever see any of these names on any packages,  
20 barrels, or anything else on the Whitney property,  
21 these names on Exhibit 3?

22 A I told you the only one I remember is Malathion.

23 Q Right.

24 A I remember that boy. I remember that.

1 Q Because it has a distinctive odor?

2 A You believe it.

3 Q And you don't remember any other distinctive odors of  
4 any kind?

5 A Outside of the whole --

6 Q The general air in East Woburn?

7 A The town. Yes, and my house is almost in the middle  
8 of it now.

9 Q And that's been a situation that's existed for a long  
10 time in Woburn?

11 A Well, that started when they started digging up and  
12 putting the buildings down the back for Stahl  
13 Chemical.

14 Q Which is what, 20 years ago?

15 A No, lately, since they got after them.

16 Q Oh, so that's just lately?

17 A Yes, they got a pit that was down there, whatever it  
18 is.

19 Q Were you ever present when any neighbors in Woburn  
20 ever complained to Whitney about anything that Whitney  
21 was doing?

22 A No.

23 MR. FACHER: I don't have anything else.

24 MR. GERONEMUS: I have one or two

1 clarifications of your clarifications.

2  
3 REDIRECT EXAMINATION

4 BY MR. GERONEMUS:

5 Q About what percentage of the time during the day would  
6 you be out on the road when you worked?

7 A It could be anytime. I could go out early in the  
8 morning, come back at noon time or not come back until  
9 after dinner.

10 Q Were you frequently out on the road for all or most of  
11 a day?

12 A Beginning was most of the time.

13 Q So you were frequently out on the road for the entire  
14 day when you worked at Whitney's?

15 MR. FACHER: Object to the form.

16 A Because the other guys used to stay in.

17 MR. FACHER: You're not trying to suggest  
18 that he didn't have the time to make these  
19 observations after calling him as your witness.

20 MR. GERONEMUS: I'm trying to establish that  
21 he spent a fair amount of time on the road.

22 MR. FACHER: Well, I'm objecting to the form  
23 of the question.

24 A Even if they come down to talk to Jack where I am I



1           can't see who it is or what they're doing or know what  
2           they're talking about. It's all Greek to me.

3           Q    Other than Malathion do you remember what was on any  
4           of the labels on the barrels that you've testified to?

5                   MR. FACHER: I object. He didn't say there  
6           were any labels on any of them.

7                   MR. GERONEMUS: Yes he did say there were.

8           A    There were paper labels on the barrels but I don't  
9           remember what they were.

10          Q    You don't remember what was on the barrels?

11          A    No.

12          Q    Other than the occasion when you went up to take the  
13          barrels off the access road --

14          A    Yes.

15          Q    -- did you ever go beyond the area where you've marked  
16          the T on the access road?

17          A    Yes. Well, it's up to the other end of that.

18          Q    Other than that occasion did you ever go beyond the T?

19          A    No, just around this end here.

20          Q    So your answer is no?

21          A    No.

22          Q    And do you know approximately how many occasions you  
23          took the tanks off the area of the access road?

24          A    No.

1 Q Have you ever been in any of the houses along Salem  
2 Street that you discussed with Mr. Facher?

3 A No.

4 MR. GERONEMUS: I don't have anything else.

5  
6 RECROSS-EXAMINATION

7 BY MR. FACHER:

8 Q You were working with these barrels, picking them up,  
9 delivering them and also involved in washing and  
10 cleaning them for over a period of roughly 25 years?

11 A Yes.

12 Q Correct?

13 A Yes.

14 Q And so you had hands on contact with these barrels in  
15 your work, correct?

16 A Yes.

17 Q And do you remember except for Malathion any of  
18 these --

19 MR. GERONEMUS: I think that's been asked  
20 and answered.

21 MR. FACHER: Well, in view of what you  
22 suggested to the witness --

23 Q Do you remember any of these names being on labels, on  
24 Exhibit 3?

1           A     No.

2                   MR. FACHER: I have nothing further.

3                   MR. GERONEMUS: And you'll be quite glad to  
4           hear that I have nothing further either.

5  
6                   (Whereupon the deposition concluded at 11:40 a.m.)  
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CERTIFICATE

I, \_\_\_\_\_ANTHONY CARCHIDE\_\_\_\_\_, do hereby  
certify that I have read the foregoing transcript of  
my testimony, and further certify that said transcript  
is a true and accurate record of said testimony.

Dated at \_\_\_\_\_, this \_\_\_\_\_ day of  
\_\_\_\_\_, 19\_\_\_\_ and signed under the pains and  
penalties of perjury.

\_\_\_\_\_  
(Deponent)

COMMONWEALTH OF MASSACHUSETTS  
MIDDLESEX, SS.

I, Lisa McDonald, a Notary Public duly commissioned and qualified in and for the Commonwealth of Massachusetts, do hereby certify that there came before me on the 22nd day of January, 1986 the person hereinbefore named, who was by me duly sworn to testify to the truth of his knowledge concerning the matters in controversy in this cause; that he was thereupon carefully examined upon his oath and his examination reduced to typewriting under my direction; and that the deposition is a true and accurate record of the testimony given by the witness.

I further certify that I am not interested in the cause of this action.

IN WITNESS WHEREOF, I have hereunto set my  
hand and affixed my notarial seal this 28th day of  
January, 1986.

Lisa McDonald

LISA McDONALD, CSR

My Commission expires:  
August 3, 1990



WOBURN  
05082  
Hwy 1  
Wells 644  
253-1111

# The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

5 Commonwealth Avenue, Woburn, MA 01801

S. RUSSELL SYLVA

Commissioner

935-2160

MEMORANDUM

TO: James Coleman, Director, Office of Incident Response.

THRU: Richard Chalpin, Acting Regional Environmental Engineer, NERO

FROM: Tony Guarciariello, Principal Sanitary Engineer, Incident Responses

DATE: February 8, 1985

SUBJECT: Woburn - PCB oil spill - Boston Edison

On February 7, 1985 at 3:45 p.m., the writer was notified by a Boston Edison dispatcher of the release of between 25 - 50 gallons of P.C.B. oil (500 ppm) from a faulty transformer at Northern Research and Engineering Corporation on Olympia Avenue.

The writer spoke with Ed O'Callahan and Richard F. McNeil, both foremen from the Woburn Service Center, at the scene. They admitted that the report of the power outage actually came in at 10 a.m. but that it had been a busy day and they were unable to respond until about 2:30 p.m.

The transformer was situated on a cement pad in the parking lot in front of the building. Oil had leaked out onto the pad and the snow was discolored. Brian Andrews, from N.R.E.C., stated that his employees had been working around the transformer after the outage. They had shoveled the oily snow in a mound and had set down some speedy-dri.

The Boston Edison crew were working on the transformer without wearing any protective gear. Upon checking with Kathy Stone Finnegan, a Boston Edison Environmental Engineer, she stated that their employees are given the option whether or not to don protective gear when the P.C.B. content of the oil is 500 ppm or less. The foreman especially, exhibited a total disdain for thir personal safety.

Although the Chlor-n-oil field test kit showed a PCB content of greater than 500 ppm, the laboratory report which was called in on a Boston Edison mobile phone at 4:00 p.m., confirmed a 249 ppm content.

Clean Harbors arrived at 5:20 p.m. to begin the clean up and a flatbed truck which Boston Edison had hired from Shaughnessy Trucking of Boston began lifting the faulty transformer off the pad. The Boston Edison crew had plugged the hole with duct seal and they were convinced that no further leakage of oil would occur during the transport to their Watertown facility.

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Memo  
Boston Edison Co.  
Page 2

Clean Harbors began shoveling the contaminated snow and speedy-dri into drums. Boston Edison Superintendent, Reardon, told me that his crew would take these drums back to their facility in Woburn and later transport them to the Watertown facility. I asked him if he would make out a manifest just as was out lined in their clean up procedures manual. He told me that it was his understanding that it was not necessary when the material was being eventually taken to their materials center in Watertown.

Kathy Finnegan confirmed that regardless of what was stated in the clean up procedures, an agreement had been struck with the Boston and the Woburn offices of DEQE that a manifest was not necessary even when a clean up contractor was called in.

Please advise.

AG/ae